

- CAN'T GET PEOPLE TO DO ANYTHING FOR YOU DEFENDANT, TICE, OPERATED, I DON'T CARE IF YOU DIED AT THIS INSTANCE, I WOULDN'T LIFT A FINGER TO HELP YOU. SEE: 31
127. SAME EVENT, ON OR NEAR 11.7.18; 12.19.18, JANUARY 2019, AND MORE THAN TWO ADDITIONAL OCCASIONS, DEFENDANT, TICE PERSONALLY OBSERVED PLAINTIFF WAS BEING DENIED CARE, FAILED TO CORRECT THESE 1ST, 8TH, 14TH AMENDMENT, RLUIPA RIGHTS ABUSES, AND ITS CONTINUING; DEFENDANT, TICE IS ALSO VIOLATING PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT
128. ON OR NEAR 11.20.18; SICK CALL; DEFENDANT, E. KAUFFMAN, PACS, DELIBERATE INDIFFERENCE TO PLAINTIFF EXPERIENCING NON STOP PAIN-N-DISCOMFORT, HAVING TO PAUSE EVERY FEW MINUTES, THE SMELL OF PLAINTIFF FEET CAUSED DEFENDANT, KAUFFMAN TO SAY, WHAT IS THAT SMELL; PLAINTIFF COMPLAINED HE COULDN'T SEE AT ALL OUT OF HIS RIGHT EYE, DEFENDANT, KAUFFMAN, LAUGHED AS IF HE'D HEARD THE GREATEST JOKE EVER, WITHOUT TOUCHING PLAINTIFF PHYSICALLY, DEFENDANT, KAUFFMAN, DECLARED, ALL YOU BLACK MEN EVER DO IS COMPLAIN, SENT PLAINTIFF AWAY IN NON STOP PAIN-N-DISCOMFORT. SEE: 21, 52, 116-120, 123, 129-133, 148, 149, 194, 195, 352-352, 354, 340, 24-26, 21, 35, 36, 39-41, 61, 68, 70, 71, 82, 348, 261, 275, 336-342, 363, 376
129. SAME EVENT, 11.20.18, DEFENDANT, KAUFFMAN, ACTIONS VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT
130. ON OR NEAR 11.27.18, SICK CALL, DEFENDANT, K. DELISMA, MEDICAL DIRECTOR DELIBERATE INDIFFERENCE TO PLAINTIFF PLEAS FOR MEDICINE FOR THE NON STOP PAIN-N-DISCOMFORT IN THE INTESTINAL TRACT TO THE DEGREE THE SLIGHTEST MOVE EXACERBATED THE PAIN, DEFENDANT, DELISMA RESPONSE, TO PLAINTIFF, YOUR REPUTATION FOR FILING BRIEVANCES-N-LAWSUIT AGAINST INDIVIDUALS UNDER HIS SUPERVISION, AND WHEN PLAINTIFF CHANGE HIS WAY, THEN PLAINTIFF WOULD RECEIVE PROPER CARE
131. ON OR NEAR 11.27.18; SAME EVENT, DEFENDANT, DELISMA, SAID TO PLAINTIFF SEE YOU, AS HE POINTED TO THE DOOR, LEAVING WITHOUT ANY TYPE OF PHYSICAL EXAM; STILL IN NON STOP PAIN-N-DISCOMFORT. DEFENDANT, DELISMA ACTIONS VIOLATED PLAINTIFF RIGHTS AND CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT SEE: 21, 25, 26, 167, 135, 157, 146, 37
132. ON OR NEAR 12.4.18, SICK CALL, DEFENDANT, E. KAUFFMAN, PACS, ANGRY THAT PLAINTIFF CITED DEFENDANT, KAUFFMAN AS A DEFENDANT IN WASHINGTON V. BARNHART, 3:17-CV-0076; DEFENDANT, KAUFFMAN DELIBERATE INDIFFERENCE TO PLAINTIFF HAVING OPEN SORES ON BOTH FEET FORCING PLAINTIFF TO WALK WITH PAIN; PAINFUL URETHRA STRICTURE, LITTLE SIGHT IN RIGHT EYE, AND NON STOP PAIN-N-DISCOMFORT SEE 56-60
133. ON OR NEAR 12.4.18, SAME EVENT, DEFENDANT, KAUFFMAN IN RACIST RANT, YOU BLACK MEN HAVE NO CONSCIENCE, WANTING HARD WORKING TAX PAYING WHITE PEOPLE TO PAY FOR YOUR MEDICAL NEEDS, WHILE WHITES WHO PAY FOR YOUR MEDICAL CARE ARE FORCED TO FOREGO THEIR OWN MEDICAL NEEDS, THEN, WITHOUT HAVING TOUCHED PLAINTIFF PHYSICALLY TO PROVIDE A CURSORY EXAM, DEFENDANT, KAUFFMAN, SHOUTED YOU ARE NOTHING MORE THAN A PARASITE, GET OUT, YOU BLACK MEN ARE ALL PARASITES. DEFENDANT, KAUFFMAN ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT SEE: 61, 62, 52, 21, 116-120, 123, 128, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000

COMPLAINT: W.V.D.

(14)

3:19-CV-196

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CLERK, U.S. DISTRICT COURT

EAST OF PENNSYLVANIA

134. ON OR NEAR 12.13.18, SICK CALL, DEFENDANT, DELISMA, MEDICAL DIRECTOR, DELIBERATE INDIFFERENCE TO PLAINTIFF IN DARK SUN GLASSES RIGHT EYE DISCHARGING PUS, INABILITY TO SPEAK ALOUD, NON STOP PAIN-N-DISCOMFORT THROUGHOUT INTESTINAL TRACT, DEFENDANT, DELISMA, TOLD PLAINTIFF, YOU MUST LEARN TO LIVE WITH PAIN-N-SUFFERING, OTHERWISE PLAINTIFF MAKE ~~THE~~ ^{BLACKS} LOOK WEAK-N-HELPLESS, WALK TO THE DOOR WHERE A SPANISH SPEAKING INMATE WAS WAITING TO SEE ANOTHER MEDICAL PROFESSIONAL SEE: 130, 131, 135, 150, ~~151-152~~ 155-157, 87, 25, 36, 29, 39, 66, 82-87, 174-176, 259, 270, 21, 29, 42-60, 40
135. ON OR NEAR 12.13.18, SAME EVENT, DEFENDANT, DELISMA TOLD THE OTHER MEDICAL PROFESSIONAL THAT HE WAS GOING TO TREAT THE SPANISH SPEAKING INMATE SO THE OTHER MEDICAL PROFESSIONAL SHOULD CALL THE NEXT INMATE. DEFENDANT, DELISMA INBADE IN COMMUNICATION IN SPANISH WITH THE SPANISH SPEAKING INMATE, TOLD PLAINTIFF TO RETURN TO THE BLOCK, THE SPANISH SPEAKING WAS YOUNG-N-JOVIAL
136. ON OR NEAR 12.13.18, SAME EVENT, DEFENDANT, DELISMA ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT
137. ON OR NEAR 12.19.18, CONFIDENTIAL INTERVIEW, DEFENDANT, TICE, E; WARDEN DELIBERATE INDIFFERENCE TO PLAINTIFF FOOT FUNGUS CAUSING PLAINTIFF FEET TO BE COVERED IN OPEN SORES WHEREIN PLAINTIFF SOCKS WERE BLOODY. HAVING SEEN THIS DEFENDANT, E. TICE SAID I DON'T WANT TO SEE THE OTHER FOOT. ACCORDING TO DEFENDANT, TICE, HE WAS FULLY AWARE OF PLAINTIFF NEED OF MEDICAL CARE, PLAINTIFF WAS BEING PUNISHED FOR HAVING SUE MEDICAL STAFF-N-DOC STAFF SEE 21, 27-33, 35, 40;
138. ON OR NEAR 12.19.18, SAME EVENT, DEFENDANT, E. TICE, DENIED PLAINTIFF REQUEST FOR MEDICAL CARE (ALSO RELIGIOUS PRACTICE, RLUIPA RIGHT, EQUAL PROTECTION OF EMPLOYMENT), DECLARED, WHY, FUCK NO! AS LONG AS I AM WARDEN YOU BET NOTHING, EVEN IF IT MEANT YOUR SURVIVAL. I AM GOING TO PENALIZE YOU FOR YOUR CONTINUOUS COMMUNICATIONS WITH AUTHORITIES; FILING GRIEVANCES-N-LAW SUIT. BECAUSE DEFENDANT, E. TICE OBSERVED THE FACT THAT PLAINTIFF WAS NOT BEING PROVIDED MEDICAL CARE, DID NOT CORRECT THESE 1st, 8th, 14th AMENDMENT, RLUIPA RIGHTS ABUSES, DEFENDANT, TICE IS ALSO VIOLATING PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT SEE 208, 209, 42-60, 220-224, 232, 236, 248, 249, 367, 31, 21
139. ON OR NEAR 12.20.18, SICK CALL, FETTERMAN, CRNP, DELIBERATE INDIFFERENCE TO PLAINTIFF HAVING EXPERIENCED A NIGHT OF DIARRHEA, NON STOP PAIN-N-DISCOMFORT THROUGHOUT INTESTINAL TRACT, BOTH FEET COVERED IN OPEN SORES SOCKS IN BLOOD, AND OTHER CHRONIC HEALTH PROBLEMS, DEFENDANT, FETTERMAN LEAVES PLAINTIFF AND GOES TO THE NEXT ROOM AND CONFERES WITH DEFENDANT, R. PLAYSO (BASED WHAT PLAINTIFF HEARD)
140. ON OR NEAR 12.20.18, SAME EVENT, DEFENDANTS, R. PLAYSO, PAC, AND FETTERMAN, WHERE DEFENDANT, PLAYSO TOLD DEFENDANT, FETTERMAN, NO! DON'T GIVE A DAMN THING, JUST TELL PLAINTIFF TO LEAVE; DEFENDANT, FETTERMAN RETURNED, WITHOUT PROVIDING A CURSORY EXAM, TOLD PLAINTIFF TO LEAVE & DEFENDANTS, FETTERMAN-N-PLAYSO ACTIONS VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT UNDER THE EIGHTH AMENDMENT BY ACTING IN CONCERT; SEE 153, 154, 159-144, 153, 158, 352, 354, 367, 21
141. ON OR NEAR 12.24.18, SICK CALL, DEFENDANTS, FETTERMAN, B.P. HYDE-N-R. PLAYSO, COMPLAINT: W V. D

STOP PAIN-N-DISCOMFORT CAUSED INTESTINAL GRIFF, TO SUCH A DEGREE PLAINTIFF WAS UNABLE TO STAND UPRIGHT; LITTLE OR NO EYESIGHT IN RIGHT EYE; AND INABILITY TO SPEAK ALOUD,

142. ON OR NEAR 12.24.18, SAME EVENT, DEFENDANT, FETTERMAN, RESPONDED TO PLAINTIFF BY LEAVING PLAINTIFF GOING TO B. P. HYDE OFFICE, AND ^{THE} TWO CAME OUT TOGETHER-N-BOTH ENTERED DEFENDANT, R. PLAYSO OFFICE LOCATED NEXT DOOR TO DEFENDANT, FETTERMAN OFFICE WHERE PLAINTIFF SAT NEAR THE DOOR WHEREIN PLAINTIFF HEARD DEFENDANTS PLAYSO-N-HYDE SAY TO DEFENDANT, FETTERMAN, THIS GUY IS SUING THE BOTH OF US, ^{SO DON'T} GIVE HIM SHIT; DEFENDANT, FETTERMAN, SAID, 'THIS GUY IS BAD OFF' SEE: 21, 354 367

143. ON OR NEAR 12.24.18, SAME EVENT, DEFENDANTS, PLAYSO-N-HYDE, SAID IN ANGER, WHO GIVES A SHIT, 'FUCK HIM'. DEFENDANT, FETTERMAN, RETURNED AND TOLD PLAINTIFF TO GET OUT OF HIS OFFICE, PLAINTIFF, SAID PLEASE, AT LEAST GIVE PLAINTIFF SOME PAIN MEDICINE, DEFENDANT, FETTERMAN, SNAPPED: 'FUCK NO! NOW SUE ME TOO, JUST GO, WITHOUT DOING A CURSORY EXAM, PLAINTIFF WAS DENIED MEDICAL CARE, DEFENDANTS, FETTERMAN, PLAYSO-N-B. P. HYDE ACTIONS IN CONCERT VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT, PER EIGHT AMENDMENT: SEE 21; 52; 54; 139-142; 144; 153; 158; 265; 352; 354; 367

144. ON OR NEAR SICK CALL, DEFETTERMAN, CRNP, DELIBERATE INDIFFERENCE TO PLAINTIFF STRUGGLE TO STAND DUE TO A LACK OF STRENGTH AFTER A NIGHT OF DIARRHEA, AND NON STOP PAIN-N-DISCOMFORT IN THE INTESTINAL TRACT, AND OTHER CHRONIC HEALTH PROBLEMS. DEFENDANT FETTERMAN, RESPONDED, 'I DON'T GIVE A DAMN, ANYBODY CAN SEE YOU'RE ^{PAIN} IN, YOU DESERVE TO BE IN PAIN, YOU MAY AS WELL SUE ME, TOO. GET OUT OF MY OFFICE, NOT EVEN MEDICINE FOR PAIN, NO CURSORY EXAM, DEFENDANT, FETTERMAN ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTE CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT SEE: 21; 25; 52; 54; 139-143; 35; 41-65, 69, 56-60 265;

145. ON OR NEAR 1.18.19, SICK CALL, DEFENDANT, R. HUTCHINSON, DOCTOR; DELIBERATE INDIFFERENCE TO PLAINTIFF ANKLES SWOLLEN NEAR TWICE THEIR NORMAL SIZE; AND BLOODY SOCKS DUE TO OPEN SORES ON PLAINTIFF FEET CAUSED BY A FOOT FUNGUS. DEFENDANT, HUTCHINSON RESPONDED, YOU ARE SUING ME, I WOULD BE A FOOL TO HELP YOU; I AM CALLING THE SHOTS NOW; YOU CAN GET OUT OF MY OFFICE MR. WASHINGTON, NEXT TIME YOU'LL HESITATE IN WHO YOU'RE SUING

146. ON OR NEAR 1.18.19, SAME EVENT, DEFENDANT, HUTCHINSON NEVER TOUCHED PLAINTIFF PHYSICALLY TO PERFORM A CURSORY EXAM, SENT PLAINTIFF AWAY IN PAIN WITHOUT MEDICINE FOR PAIN, DEFENDANT, HUTCHINSON ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT.

147. ON OR NEAR 1.17.19, INCOMING MAIL, DEFENDANT, B. P. HYDE, (OR JOHN DOE) HEALTH CARE ADMINISTRATOR, DELIBERATE INDIFFERENCE, DISCARDED PLAINTIFF TIMELY SUBMITTED SICK CALL REQUEST BY RETURNING THE SICK CALL REQUEST TO PLAINTIFF IN THE INCOMING MAIL, DEFENDANT, HYDE PER POLICY SHOULD SCHEDULE A INMATE TO BE SEEN THE NEXT DAY AFTER RECEIVING A SICK CALL REQUEST, THIS CAUSED PLAINTIFF UNDERGO UNNECESSARY PAIN-N-SUFFERING

COMPLAINT: W.V.D

DEFENDANT, HYDE ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT ^{SEE: 36, 39, 66, 29, 33, 42-60, 67, 70-72, 159-162, 210, 211, 216, 217, 248, 353, 354, 364, 367, 21, 27, 40}

178. ON OR NEAR 2.4.19, SICK CALL, DEFENDANT, E. KAUFFMAN, PAC, DELIBERATE INDIFFERENCE TO PLAINTIFF NON STOP PAIN-N-DISCOMFORT IN INTESTINAL TRACT TO SUCH A DEGREE SLEEP IS DISRUPTIVE; FINGERS, ELBOWS-N-ANKLES DEFORM, URETHRA STRICTURE, AND IRREVERSIBLE FOOT FUNGUS. DEFENDANT, KAUFFMAN RESPONSE WAS, "HE DON'T HAVE THE TIME TO HEAR BLACK MEN WHINE" THEN SUE HIM FOR NOT PROVIDING PLAINTIFF MEDICAL CARE. ^{SEE: 275, 21, 117, 128, 133, 24, 27, 40}
149. ON OR NEAR 2.4.19, SAME EVENT, DEFENDANT, KAUFFMAN NEVER TOUCHED PLAINTIFF PHYSICALLY FOR A CURSORY EXAM, NO MEDICINE FOR PAIN; TOLD PLAINTIFF TO LEAVE, DEFENDANT, KAUFFMAN ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT ^{SEE: 352}
150. ON OR NEAR 2.8.19, SICK CALL, DEFENDANT, K. DELISMA, MEDICAL DIRECTOR, DELIBERATE INDIFFERENCE TO PLAINTIFF EXPERIENCING NON STOP PAIN-N-DISCOMFORT IN INTESTINAL TRACT TO WHERE PLAINTIFF IS AWAKEN FROM HIS SLEEP; STRUGGLING TO SPEAK; AND OTHER CHRONIC HEALTH PROBLEMS. DEFENDANT, DELISMA, RESPONSE, "PLAINTIFF WAS CAUSING WE BLACK FOLKS TO LOOK WEAK IN THE EYES OF WHITE PEOPLE BY PLAINTIFF CONTINUOUS REQUEST FOR MEDICAL CARE WHEN BLACKS HAVE OBAMA CARE". NO CURSORY EXAM, NO MEDICINE FOR PAIN. DEFENDANT, DELISMA ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT ^{SEE: 21, 25, 52, 62, 86, 87, 352, 354, 367, 130, 134, 135, 155-157, 170-172, 259, 270, 27, 40}
151. ON OR NEAR 2.19.19, EYE EXAM, DEFENDANT, R. ERWIN, OPTOMETRIST, DELIBERATE INDIFFERENCE TO PLAINTIFF LOST OF EYESIGHT IN RIGHT EYE WHILE EXHIBITING SWELLING, AND PAIN WITH EACH MOVEMENT OF THE EYE. DEFENDANT, ERWIN ANGRY THAT PLAINTIFF FOR HAVING SUED HIM, TOLD PLAINTIFF, YOU CAN GO BLIND IN BOTH EYES FOR WHAT I CARE, REFUSED TO REFER PLAINTIFF TO THE OPHTHALMOLOGIST FOR LASER SURGERY ^{SEE: 21, 25, 68-72, 190, 197, 262, 276}
152. ON OR NEAR ~~2.19.19~~ ^{2.19.19}, SAME EVENT, DEFENDANT, ERWIN REFUSAL TO REFER PLAINTIFF TO A OPHTHALMOLOGIST FOR LASER SURGERY FORCED PLAINTIFF TO ENDURE UNNECESSARY PAIN-N-SUFFERING; AND ALLOWED PLAINTIFF LACK OF EYESIGHT TO GET WORST; DEFENDANT, ERWIN ACTIONS VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT ^{SEE: 21, 25, 350, 352, 24-26, 27, 42-51, 54, 56-60, 39, 40, 340-342, 367, 40, 363, 364}
153. ON OR NEAR 3.22.19, SICK CALL, DEFENDANT, TESTA, PACS, DELIBERATE INDIFFERENCE TO PLAINTIFF NON STOP PAIN-N-DISCOMFORT IN INTESTINAL TRACT. ACCOMPANIED BY DIARRHEA; AND SLEEP DISRUPTION. DEFENDANT, TESTA RESPONDED BY LEAVING PLAINTIFF TO GO TO THE OFFICE OF DEFENDANT, R. PLAYSO; PACS, NEXT DOOR; PLAINTIFF HEAR THEM TALKING; DEFENDANT, PLAYSO STATED, "HE IS SUING ME AND OTHERS IN THIS DEPARTMENT NEVER GIVE ^{HEM} ANYTHING, SEND HIM AWAY IMMEDIATELY", DEFENDANT, TESTA, SAID HE REALLY LOOKS TO BE BAD OFF. DEFENDANT, PLAYSO, SAYS, THAT DOESN'T MATTER, SEND HIM AWAY
154. ON OR NEAR 3.22.19, SAME EVENT, DEFENDANT, TESTA RETURNED, AND WITHOUT A CURSORY EXAM OR MEDICINE FOR PAIN, TOLD PLAINTIFF TO LEAVE AT ONCE. DEFENDANTS, PLAYSO-N-TESTA ACTED IN CONCERT VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL COMPLAINT: W.V.D

- AND UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT SEP: 153, 21, 205, 206, 35, 39, 40, 61-65, 166, 267
155. ON OR NEAR 4.2.19, SICK CALL, DEFENDANT, K. DELISMA, MEDICAL DIRECTOR, DELIBERATE INDIFFERENCE TO PLAINTIFF CHRONIC HEALTH PROBLEM, CAUSING A NEAR ZERO EYESIGHT IN RIGHT EYE, SLOW HEART RATE, DEFORMED FINGERS, ELBOWS-N-ANKLES, ALL TOE-NAILS DISCOLORED-N-FEET OFTEN COVERED IN OPEN SORES; DEMENTIA; NON STOP PAIN-N-DISCOMFORT IN INTESTINAL TRACT TO SUCH A DEGREE PLAINTIFF IS AWKEN FROM SLEEP, PLAINTIFF BEGGED FOR MEDICINE TO RELIEVE THE PAIN, SEP: 25, 82, 84-87, 376, 130, 21,
156. ON OR NEAR 4.2.19, SAME EVENT, DEFENDANT, DELISMA, ANGRY WITH PLAINTIFF FOR FILING GRIEVANCE AGAINST DEFENDANT, DELISMA, AND FILING LAW SUITS AGAINST MEMBERS OF THE MEDICAL STAFF, WHICH IS NOW UNDER DEFENDANT, DELISMA SUPERVISION; AND PLAINTIFF CONTINUOUS COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, DELISMA DECLARED, I PERSONALLY WARNED YOU, WHEN YOU DISCONTINUE FILING LAW SUITS-N-GRIEVANCES, AND COMMUNICATIONS WITH AUTHORITIES, THAT'S WHEN YOU GET PROPER MEDICAL CARE; PLAINTIFF DIDN'T LISTEN; PLAINTIFF IS NOW FILING GRIEVANCES AGAINST DEFENDANT, DELISMA SEP: 163-165, 134, 135, 150, 130, 340, 364, 21
157. ON OR NEAR 4.2.19, SAME EVENT, DEFENDANT, DELISMA, DECLARED, YOU BROUGHT THIS ON YOURSELF, SO GO FIND YOUR MEDICAL CARE ELSEWHERE, NO MEDICINE FOR PAIN, NOT EVEN A CURSORY EXAM; DEFENDANT, DELISMA TOLD PLAINTIFF TO LEAVE HIS OFFICE. DEFENDANT, DELISMA ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT SEP: 27, 40, 62, 270, 259, 350, 344
158. ON OR NEAR 4.12.19; SICK CALL; DEFENDANT, TESTA, PACS, DELIBERATE INDIFFERENCE TO PLAINTIFF WEARING DARK SUNGLASSES, RIGHT EYE ~~SWOLLEN~~ SHUT-N-THROBBING IN PAIN, DEFENDANT, TESTA, LEFT PLAINTIFF AND CONFERRED WITH HER CO-MEDICAL PROFESSIONAL NEXT DOOR, WHERE PLAINTIFF HEAR SAY TO THAT PERSON WASHINGTON EYE IS SWOLLEN SHUT THE CO-WORKER TOLD HER SO WHAT SEND HIM AWAY, DEFENDANT, TESTA RETURNED AND DIDN'T EXAM PLAINTIFF EYE, BUT DEFENDANT, TESTA BEGAN TO SCOLD PLAINTIFF IN RACIST OVERTONES; GAVE PLAINTIFF THE MIDDLE FINGER, SHOUTED, CAN YOU SEE THIS NOW GET OUT, DEFENDANT, TESTA ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT AMENDMENT; SEP: 21, 26, 166, 344, 40, 27, 338-342, 363, 368
159. ON OR NEAR 5.6.19 - 5.8.19; MEDICAL EMERGENCY; DEFENDANT, B. P. HYDE, HEALTH CARE ADMINISTRATOR, DELIBERATE INDIFFERENCE; DEFENDANT, HYDE IS RESPONSIBLE FOR PROVIDING INMATES ACCESS TO MEDICAL CARE, WHICH INCLUDES SICK CALL-N-EMERGENCY MEDICAL CARE, PLAINTIFF AWAKEN UNABLE TO HEAR IN THE LEFT EAR, REPEATEDLY THE POD OFFICER OF AB CONTACTED THE HOSPITAL, i.e. SCI-SOMERSET MEDICAL STAFF. THE AB OFFICER ON THE SECOND-N-THIRD DID THE SAME. NO RESPONSE TO EACH CALL. SEP: 36, 352, 39, 66, 350
160. ON OR NEAR 5.6.19 - 5.18.19, SAME EVENT, PLAINTIFF SUBMITTED SICK CALL REQUEST PRIOR TO 5.6.19, AND ALSO ON 5.6.19, 5.7.19, 5.18.19; THE POD OFFICERS ON THE FIRST, SECOND, AND THIRD SHIFTS CALLED REPEATED ON PLAINTIFF BEHALF, NO RESPONSE TO EACH CALL. THE REASON THE POD OFFICERS CONTINUED TO CALL IS PLAINTIFF NAME WAS NOT PLACE ON THE CALL OUT FOR SICK CALL, THEREFORE, PLAINTIFF FOUR SICK CALL REQUEST WERE PROBABLY ALL DISCARDED. DURING THIS PERIOD PLAINTIFF EXPERIENCE PAIN-N-SWELLING COMPLAINT: W V. D

- CLOSING THE EARHOLE, BEHIND THE EAR EXTENDING DOWN THE BACK OF THE NECK,
161. ON OR NEAR 5.6.19-5.8.19, SAME EVENT, FOR THE NEXT FOUR STRAIGHT WEEKS PLAINTIFF EXPERIENCED A LOSS OF HEARING IN THE LEFT EAR, PLAINTIFF LEFT EARHOLE REMAINED SWOLLEN SHUT FOR MORE THAN TWO WEEK, THE SWELLING BEHIND PLAINTIFF LEFT EAR-N-DOWN INTO THE NECK AREA COULD BE DETECTED FOR NEARLY A MONTH. HAD THE MEDICAL DEPARTMENT, i.e. STAFF RESPONDED TO MANY CALLS BY AB PD OFFICERS AND/OR RESPONDED TO PLAINTIFF FOUR TIMELY SUBMITTED SICK CALL REQUEST, AS WELL AS THE TWO-THREE SICK CALL REQUEST PLAINTIFF WOULD NOT UNDERGONE SUCH UNNECESSARY PAIN-N-SUFFERING ^{SEE: 21; 36, 39; 66, 350, 352, 142, 143, 147, 159-160, 162, 183, 52} 376
162. ON OR NEAR 5.6.19-5.8.19, SAME EVENT, DEFENDANT, B. P. HYDE ~~NON~~ NON RESPONSE TO NUMERS CALL FOR EMERGENCY, AND NON RESPONSE TO PLAINTIFF MANY TIMELY SUBMITTED SICK CALL REQUEST IS A DENIAL OF ACCESS TO MEDICAL CARE VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT ^{376; 159-161; 210-211; 29; 31; 30; 70-72; 52;}
163. ON OR NEAR 5.30.19, SICK CALL, DEFENDANT, K. DELISMA, MEDICAL DIRECTOR; DELIBERATE INDIFFERENCE TO PLAINTIFF FEET COVERED IN BLOOD DUE TO FOOT FUNGUS; STILL EXPERIENCING A LOSS OF HEARING IN LEFT EAR; AND NON STOP PAIN-N-DISCOMFORT IN INTESTINAL TRACT. DEFENDANT, DELISMA, RESPONDED BY WALKING OUT OF THE OFFICE, THEN BEGIN A CONVERSATION WITH SOMEONE, THEN RETURNED, DECLARED TO PLAINTIFF, "I AM VERY HAPPY YOU'RE IN PAIN", "PAIN IS GOOD FOR YOU" ^{SEE: 134; 150; 376}
164. ON OR NEAR 5.30.19, SAME EVENT, DEFENDANT, DELISMA ~~WENT~~ BOTHER TO CONDUCT A CURSORY EXAM; LAUGHING UNCONTROLLABLY, DEFENDANT, DELISMA POINTING TO THE DOOR AS HE LAUGHED, OUT, GET THE FUCK OUT; AND AS PLAINTIFF LUMBERED AWAY DEFENDANT, DELISMA STATED, "FILE A BRIEVANCE ON THAT". DEFENDANT, DELISMA ACTS VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT ^{SEE: 21-33, 35, 40, 42-45, 67-71, 87, 52, 54, 130-131, 134-136, 150, 155-157, 163-172, 174-176, 213, 244, 259, 270, 350, 352-354, 363, 364, 367, 376}
165. ON OR NEAR 6.17.19, SICK CALL, DEFENDANTS, K. DELISMA-MEDICAL DIRECTOR, AND TESTA, PACS; DELIBERATE INDIFFERENCE TO PLAINTIFF SERIOUS MEDICAL NEEDS, i.e. DUE TO NON STOP PAIN-N-DISCOMFORT IN INTESTINAL TRACT PLAINTIFF OBTAIN LESS THAN SIX HOURS SLEEP IN THE LAST 4 DAYS, WHILE WAITING IN THE LOBBY DEFENDANT, DELISMA PASSING THROUGH DEFENDANT, DELISMA CAME OVER TO PLAINTIFF, DECLARED, "WASHINGTON, MAN, ARE YOU GOING TO MAKE IT INSIDE, YOU LOOK JUST LIKE YOU'RE AT DEATH'S DOOR" ^{SEE: 175, 176, 177, 270, 166}
166. ON OR NEAR 6.17.19, SAME EVENT, DEFENDANT, TESTA, WHEN PLAINTIFF WAS CALLED INSIDE, BEFORE PLAINTIFF COULD TAKE A SEAT, DEFENDANT ^{TESTA} RUSHED OUT OF DEFENDANT, DELISMA OFFICE; SAID TO PLAINTIFF, AS SHE HELD THE MIDDLE FINGER OF BOTH HAND EXTENDED, ~~THESE~~ THESE ARE FOR YOU, DON'T SIT DOWN, DEFENDANT, DELISMA, HAD SPOKE TO PLAINTIFF IN THE LOBBY. NOT EVEN A CURSORY EXAM. DEFENDANTS, DELISMA-N-TESTA ACTION VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER 8th AMD.
- COMPLAINT: W.V.D (19)

167. ON OR NEAR 8.1.19, SICK CALL, DEFENDANT, K. DELISMA, DELIBERATE INDIFFERENCE TO PLAINTIFF NON STOP PAIN-N-DISCOMFORT IN THE INT-ESTINAL TRACT CAUSING PLAINTIFF TO BE AWAKEN FROM SLEEP, OPEN SORES ON BOTH FEET, PERIODIC LOSS HEARING IN LEFT EAR, URETHRA STRICTURE WHEREIN PLAINTIFF IS FORCED TO KEEP HIS PENIS WRAPPED IN TOILET PAPER; PLAINTIFF BEGGED DEFENDANT, DELISMA FOR MEDICINE FOR PAIN, DEFENDANT, DELISMA, USED THE MIDDLE RAISED ON BOTH HAND, HELD UP WITH IN INCHES OF PLAINTIFF FACE, AS DEFENDANT, DELISMA USED A TWISTING MOTION WITH BOTH HANDS-N-FINGERS; THEN TOLD PLAINTIFF TO GET THE FUCK OUT,
168. ON OR NEAR 8.1.19, SAME EVENT, DEFENDANT, DELISMA ACTIONS VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT
169. ON OR NEAR 9.5.19, IN TRAVEL; DEFENDANT, DELISMA, MEDICAL DIRECTOR; DELIBERATED INDIFFERENCE TO HAVING RECOGNIZED PLAINTIFF ON THE SIDE AS DEFENDANT, DELISMA WAS IN ROUTE TO STAFF DINING HALL. DEFENDANT, DELISMA, K. STOPPED PLAINTIFF AND ASKED PLAINTIFF, ARE YOU GOING TO MAKE IT? YOU'RE LIMPING IS IT YOUR FEET AGAIN? WHY ARE YOU CROUCHING? PLAINTIFF SAID PLEASE HELP ME, MY FEET ARE BLEEDING, MY STOMACH IS KILLING ME, I AM HURTING. PLEASE SOMETHING IMMEDIATELY
170. ON OR NEAR 9.5.19; SAME EVENT, DELISMA, K.; (PRIOR TO AND AFTER ^{PLAINTIFF} SUBMITTED TWO-THREE SICK CALL, MORE THAN SIX STRAIGHT WEEKS PLAINTIFF SICK CALL REQUEST HAVE BEEN DISCARDED) RESPONDED, PLAINTIFF CONTINUED TO COMMUNICATE WITH AUTHORITIES, FILING BRIEVANCES AGAINST DEFENDANT, K. DELISMA PERSONALLY; AND FILING LAW SUITS AGAINST STAFF UNDER DEFENDANT, DELISMA SUPERVISION, SO AS A PUNISHMENT DEFENDANT, DELISMA WOULD NOT PROVIDE PLAINTIFF MEDICAL CARE; PLAINTIFF WAS ON HIS OWN, DEFENDANT, K. DELISMA ACTIONS VIOLATED PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER EIGHTH AMENDMENT SEE: 21-29, 35, 36, 39, 40, 41-62, 70, 71, 82-87, 348, 350, 352, 354, 356, 362-364, 363, 370

COUNT TWO: EQUAL PROTECTION

171. PLAINTIFF ALLEGES AND INCORPORATES BY REFERENCE PARAGRAPHS 1-THROUGH 170
172. PLAINTIFF IS A MEMBER OF A PROTECTED CLASS? A PERSON WHO BENEFIT FROM PROTECTION BY STATUTE SUCH AS TITLE VII, OF THE CIVIL RIGHTS ACT OF 1964, WHICH PROHIBITS DISCRIMINATION BASED ON RACE, NATION ORIGIN OR RELIGION
173. PLAINTIFF ALLEGES TO BE A MEMBER OF A PROTECTED CLASS BASED ON PLAINTIFF RACE, PLAINTIFF AGE, AND PLAINTIFF RELIGIOUS BELIEFS. PLAINTIFF, A 75 YEAR OLD DARK SKIN BLACK MALE, FOUNDER-N-LEADER OF THE 'CHILDREN OF THE SUN CHURCH'; PLAINTIFF THE ACKNOWLEDGED FOUNDER-N-LEADER OF THE CHILDREN OF THE SUN CHURCH, BASKET BALL OFFICIAL SINCE 1965; SOFTBALL UMPIRE SINCE 1956; FOOTBALL, AND VOLLEY BALL OFFICIAL; UNQUESTIONABLY QUALIFIED; PLAINTIFF SUFFERED FROM SOME FORMS OF ADVERSE EMPLOYMENT ACTION, ACCESS TO RELIGIOUS PRACTICE, MEDICAL CARE, AND RETALIATION
174. DEFENDANTS, K. DELISMA, WILLIAM L. BOWERS, PHILLIP MAUST, HEIDI COM PLAIN: W V, D

Case 3:19-cv-00196-LPL Document 1-3 Filed 11/12/19 Page 8 of 30
SROKA, ROBERT SNYDER, K. PESCHOCK, J. GERONE, ELLIS KAUFFMAN, RICHARD IRWIN,
ROXANNE PLAYSO, LARENE DARLING, FETTERMAN, RICHARD HUTCHINSON, TESTA,
ERIC TICE, BRIAN (B.P.) HYDE

PER RETALIATION CONDUCT OCCURRED WHERE OTHER INMATES IN SIMILAR SITUATED
WERE PROVIDED SERVICES-N-OPPORTUNITIES, WHOM ARE ^{NOT} A PROTECTED CLASS; YOUNGER,
AND LESS QUALIFIED. SEE: 1-376 PRISM

175. PLAINTIFF WAS SINGLED OUT AS A CLASS OF ONE; DEFENDANTS, K. DELISMA, WILLIAM
L. BOWERS, PHELLIP MAUST, HEIDI SROKA, ROBERT SNYDER, R. PESCHOCK, J. GERONE,
ELLIS KAUFFMAN, RICHARD IRWIN, ROXANNE PLAYSO, LARENE DARLING, FETTER-
MAN, RICHARD HUTCHINSON, TESTA, ERIC TICE, BRIAN (B.P.) HYDE

RETALIATORY ACTIONS WERE INTENTIONAL, IRRATIONAL AND DONE REGULARLY

176. ON OR NEAR 11.27.18; 12.13.18; 2.8.19; 4.2.19; 5.30.19; 6.17.19; 8.1.19; 9.5.19, SICK
CALL, DEFENDANT, K. DELISMA, MEDICAL DIRECTOR, DISCRIMINATED AGAINST PLAINTIFF;
TREATED PLAINTIFF AS A CLASS OF ONE; AND FOR NO RATIONAL REASON, i.e. RACE, TO PENAL-
IZE PLAINTIFF FOR COMMUNICATIONS WITH AUTHORITIES; NON MEDICAL REASONS. DEFENDANT,
DELISMA ACTION VIOLATED PLAINTIFF EQUAL PROTECTION RIGHTS PER 14th AMENDMENT
SEE: 130, 131; 135, 150; 155-157; 163-168; 169, 170,

177. ON OR NEAR 10.6.17; 1.9.18; 4.9.18; 9.10.19; DEFENDANT, WILLIAM L BOWERS TO
DATE! HOUSING; RELIGIOUS PRACTICE; A-BLOCK UNIT MANGER FOR NO RATIONAL
REASONS, TARGET, INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF, RETALIATORY TR-
EATED PLAINTIFF AS A CLASS OF ONE. SEE: 106-112; 250; 251, 214, 217; 221, 222, 224, 237, 240, 243

178. ON OR NEAR 10.6.17, CONTINUED UNTIL ON OR NEAR 2.18.19; HOUSING; DEFENDANT,
BOWERS, SAME EVENT; ASSIGNED ALL OTHER OTHER INMATES, ESPECIALLY WHITE
WHITE INMATES TO THE CELL OF THEIR CHOICE UPON REQUEST, EVEN WITH FOREKNOW-
LEDGE OF THE RISK TO PLAINTIFF MENTAL HEALTH, BASED ON NON PENOLOGICAL INTER-
EST, i.e. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES.

179. DEFENDANT, BOWERS DISREGARDED THE RISK, CONTINUED TO FORCE! PLAINTIFF TO HOUSE
UNTIL 2.18.19, WHERE ^{DUED TO THE} LOCATION OF THE CELL CONTINUOUSLY CAUSED PLAINTIFF PSY-
CHOLOGICAL PROBLEMS, PRIOR TO 2.18.19, DEFENDANT, BOWERS HAD NEVER ASSIGNED
A WHITE INMATE TO HOUSE IN SUCH CELL, DEFENDANT, BOWERS ACTIONS VIOLATED
PLAINTIFF RIGHTS-N-CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT PER 8th AMENDMENT
AND EQUAL PROTECTION PER 14th AMENDMENT SEE: 106-112

180. ON OR NEAR 9-10.19, RELIGIOUS PRACTICE; WILLIAM L. BOWERS FOR NO RATIONAL REA-
SONS, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED AS
A CLASS OF ONE. SEE: 106-112, 121, 213-224; 236, 237, 240, 243; 245; 250; 251, 271; 177-179; 181

181. DEFENDANT, BOWERS ON A DAILY BASIS SUCCESSFULLY RECOGNIZED PRIOR COURT APPROV-
ED COURT ORDERS (AND OR SOL-SOMERSET APPROVED EXCEPTION FOR EXTRA PROPERTY IN
SIDE THE INMATES ESPECIALLY THE RELIGIOUS PROPERTY OF WHITE INMATES, BASED ON
NON PENOLOGICAL REASONS, i.e. RACE, RELIGIOUS BELIEFS, RETALIATIONS, PENALTY FOR COM-
MUNICATION WITH AUTHORITIES, DEFENDANT, BOWERS DENIED PLAINTIFF RELIGIOUS LITERAT-
URE, BY USE OF THE MOST RESTRICTIVE MEANS, DEFENDANT, BOWERS ACTIONS CONSTITUTED
RLUIPA-N-EQUAL PROTECTION VIOLATIONS PER 42 USC 2000cc-N-14th AMENDMENT SEE 225,

COMPLAINT: W V. D 232, 236, 250, 251, (21) 271

182. ON OR NEAR 8.21.17, RELIGIOUS PRACTICE, DEFENDANT, MAUST, CHAPLAIN, FOR NO RATIONAL REASONS, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED PLAINTIFF AS A CLASS OF ONE; 18 USC 133247; 71 P.S. 581-1; SEE 213, 217, 218, 221-229, 236, 244, 255-257
183. DEFENDANT, MAUST ON A DAILY BASIS SUCCESSFULLY PROVIDED RELIGIOUS LITERATURE TO ALL OTHER INMATES, ESPECIALLY INMATES OF NON AFRICAN BELIEFS, WHITES IN PARTICULAR, BASED ON NON PENOLOGICAL REASONS, I.E. RACE, RELIGIOUS BELIEFS, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES. DEFENDANT, MAUST DENIED PLAINTIFF RELIGIOUS LITERATURE, BY THE USE OF THE MOST RESTRICTIVE MEANS, DEFENDANT, MAUST ACTIONS CONSTITUTES RLUIPA, RELIGIOUS PRACTICE AND EQUAL PROTECTION VIOLATIONS PER 42 USC 2000cc 1-5; 1st-N-14th AMENDMENTS
184. BEGINNING ON OR NEAR 7.16.15 CONTINUED UNTIL REASSIGNMENT, DENIAL TO ADM 804 INMATE GRIEVANCE SYSTEM; DEFENDANT, H. SROKA, WARDEN'S ASSISTANT FOR NO RATIONAL REASON TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF AND TREATED PLAINTIFF AS A CLASS OF ONE SEE 213, 214, 232, 236, 244-247
- DEFENDANT, SROKA PROCESSED THE TIMELY SUBMITTED GRIEVANCES OF ALL OTHER INMATES. BASED ON NON PENOLOGICAL REASONS, I.E. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DEFENDANT SROKA DID NOT PROCESS NUMEROUS OF PLAINTIFF TIMELY SUBMITTED GRIEVANCES. N.B. ALL REQUESTED MONETARY RELIEF. DEFENDANT SROKA ACTION CONSTITUTE FREE SPEECH-N-EQUAL PROTECTION PER 1st-N-14th AMENDMENT; SEE 89-93. 100-105, 184, 232, 236, 244-247, 340-348, 357, 370-372, 74, 71, 30, 31, 35, 37-60
185. ON OR NEAR 4.8.17 - ONGOING UNTIL DEFENDANT, R. SNYDER, WAS REASSIGNED, SECURITY CAPTAIN/MAJOR, FOR NO RATIONAL REASONS, TARGETED/RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED PLAINTIFF AS A CLASS OF ONE
186. DEFENDANT, SNYDER SUCCESSFULLY THROUGHOUT THE COURSE OF THE DAY ON A DAILY BASIS PROVIDED SAFETY FOR ALL OTHER INMATES, ESPECIALLY WHITE INMATES. BASED ON NON PENOLOGICAL REASONS, RACE, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, R. SNYDER AIDED-N-ABETTED TWO YOUNG "WHITE INMATES" TO SUCCESSFULLY STEAL PLAINTIFF RELIGIOUS BOOKS, DEFENDANT, R. SNYDER ACTIONS VIOLATED PLAINTIFF RIGHTS AND CONSTITUTE DENIAL OF RELIGIOUS PRACTICE, RLUIPA-N-EQUAL PROTECTION UNDER 42 U.S.C. 2000cc 1-5; 18 USC 133247; 71 P.S. 581-1; AND 1st, -N-14th AMENDMENTS SEE 213, 214, 232, 236, 244, 252-254, 27, 35, 42-51, 56-60
187. ON OR NEAR 4.11.18, AND THROUGHOUT THE BASKETBALL SEASON; EMPLOYMENT, DEFENDANT, R. PESCHOCK, ACTIVITIES SPECIALIST FOR NO RATIONAL REASONS INTENTIONALLY, TARGETED, RETALIATED, DISCRIMINATED AGAINST PLAINTIFF, AND TREATED PLAINTIFF AS A CLASS OF ONE. SEE 213, 244, 188-191, 273, 340, 341, 351, 358-364, 376
188. DEFENDANT, PESCHOCK, SAME EVENTS, DURING MORE THAN THREE CONFIDENTIAL INTERVIEWS, DEFENDANT, PESCHOCK DECLARED, "SHE CANT STAND THE GAME OF BASKETBALL", "SHE DOESNT WATCH THE GAMES PLAYED UNDER HER SUPERVISION", "SHE'S NOT CONCERN ABOUT HOW EFFICIENT BASKETBALL OFFICIAL PERFORM THEIR DUTIES ON THE FLOOR", "SHE ASSIGNED INMATES ACCORDING TO THEIR AGE". SEE 213, 214, 27, 35, 37-51, 56-60.
189. SAME EVENT, DEFENDANT, PESCHOCK CONSISTENTLY BY PASSED PLAINTIFF BASED ON COMPLAINT: W.V.D

- NON PENOLOGICAL REASONS, I.E. RACE, CLICKS FOUNDED ON GAMES, DEFENDANT, PESCHOCK ASSIGNED PLAINTIFF TO MENIAL ROLES, I.E. SWEEPING THE FLOOR CHASING LOOSE BASKETBALLS, FOLDING JERSEYS; WHILE ASSIGNING INMATES WITH LESS THAN HALF THE EXPERIENCE THAT PLAINTIFF HAS, LESS FOOT SPEED, OFTEN LAZY; TO CENTRAL ROLES I.E. OFFICIATING THE GAME SEE: 27, 35, 42-51, 56-60, 376
190. SAME EVENTS, DEFENDANT, PESCHOCK READILY ADMITTED, THAT DURING THE LIMITED OFFICIATING PLAINTIFF WAS ASSIGNED NOT ONCE WAS THE GAME STOPPED OR DELAYED DUE TO PLAINTIFF BEING EXHAUSTED, OR INABILITY TO KEEP UP. DEFENDANT, PESCHOCK CONSISTENTLY ASSIGNED INMATES WHO STOOD IN ONE SPOT INSTEAD OF MOVING WITH THE FLOW OF THE GAME, WHO CONSISTENTLY-N-CONSTANTLY ENGAGED IN VERBAL SPARRING WITH THE PLAYERS DURING THE GAME, INSTRUCTING PLAYERS-N-COACHES ON HOW TO SUCCESSFULLY WIN THE GAME, OPENLY CRITICIZED FELLOW OFFICIAL DURING THE COURSE OF THE GAME
191. SAME EVENTS, PLAINTIFF REPEATEDLY REQUESTED TO BE ASSIGNED TO OFFICIATE THE GAME DURING EACH CONFIDENTIAL INTERVIEW WITH DEFENDANT, PESCHOCK WHO REFUSED TO DO SO BASED ON NON PENOLOGICAL REASONS, WHICH TO DATE, I CONTINUE TO FOSTER, AND AIDED-N-ABETTED THE STILL ONGOING WORKINGS OF A CLICK; WILLINGLY OR UNWITTINGLY. DEFENDANT, PESCHOCK ACTIONS CONSTITUTED EQUAL PROTECTION VIOLATIONS PER 14TH AMENDMENT 244, 273, 27, 35, 42-51, 56-60, 376
192. ON OR NEAR 1.15.18; SICK CALL, DEFENDANT, J. GIBONE, DOCTOR, FOR NO RATIONAL REASON, TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED PLAINTIFF AS A CLASS OF ONE SEE: 52, 113-115, 27, 42-51, 56-60, 213, 240, 260, 274 364, 352-354, 52, 21, 346, 376, 364
193. DEFENDANT, GIBONE WHILE CONDUCTING THE SAME SICK CALL PROVIDED MEDICAL CARE SUCCESSFULLY FOR ALL OTHER INMATES ESPECIALLY WHITE INMATES, BASED ON NON MEDICAL REASONS, I.E. RACE, RETALIATION, PENALTY FOR COMMUNICATION WITH AUTHORITIES. DEFENDANT, GIBONE DENIED PLAINTIFF MEDICAL CARE. DEFENDANT, GIBONE ACTIONS CONSTITUTED VIOLATIONS OF PLAINTIFF EQUAL PROTECTION RIGHTS PER 14TH AMENDMENT SEE: 367, 364.
194. ON OR NEAR 3.13.18; 4.3.18, 11.6.18; 12.4.18; 2.4.19; DEFENDANT, E. KAUFFMAN, DOCTOR, FOR NO RATIONAL REASON TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED PLAINTIFF AS A CLASS OF ONE. SEE: 261, 195, 56-60, 52
195. DEFENDANT, KAUFFMAN WHILE CONDUCTING THE SAME SICK CALL SUCCESSFULLY PROVIDED MEDICAL CARE FOR ALL OTHER INMATES, ESPECIALLY WHITE INMATES, BASED ON NON MEDICAL REASONS, I.E. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES DEFENDANT, KAUFFMAN DENIED PLAINTIFF MEDICAL CARE. DEFENDANT, KAUFFMAN ACTIONS VIOLATED PLAINTIFF EQUAL RIGHTS CONSTITUTES EQUAL PROTECTION; PER 14TH AMENDMENT SEE: 52, 116-120, 123, 128, 132, 133, 148, 132, 213, 244, 261, 275, 27, 42-51, 261
196. ON OR NEAR 9.27.17, 10.18.17; 2.19.19; EYE EXAMINATION, DEFENDANT, R. IRWIN, OPTOMETRIST, TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF FOR NO RATIONAL REASON, I.E. RACE, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, AND TREATED PLAINTIFF AS A CLASS OF ONE SEE: 197, 262, 276, 27, 42-51, 56-60, 213, 244, 52
197. DEFENDANT, IRWIN WHILE CONDUCTING THE SAME SESSION OF EYE EXAMINATION PROVIDED ALL OTHER INMATES SUCCESSFULLY, ESPECIALLY WHITE INMATES, MEDICAL CARE. TARGETED
- COMPLAINT: W.V.D.

ED PLAINTIFF TO DENY MEDICAL CARE BASED ON NON MEDICAL REASONS, I.E. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, IRWIN ACTIONS VIOLATED PLAINTIFF RIGHTS TO EQUAL PROTECTION UNDER THE 14TH AMENDMENT, SEE 27, 42-51, 56-60, 198. ON OR NEAR 12.24.18, 3.22.19, SICK CALL, DEFENDANT, R. PLAYSO, PACS SUCCESSFULLY PROVIDED MEDICAL CARE TO ALL OTHER INMATES, FOR NO RATIONAL REASON TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED PLAINTIFF AS A CLASS OF ONE SEE 27, 263, 27, 42-51, 56-60, 213, 244, 52, 139, 143, 158, 244, ~~245~~, 350, 351-354, 340-342, 364, 376, 199, DEFENDANT, PLAYSO, WHILE CONDUCTING THE SAME SICK CALL SUCCESSFULLY PROVIDED MEDICAL CARE TO ALL OTHER INMATES, ESPECIALLY WHITE INMATES, DENIED PLAINTIFF MEDICAL CARE BASED ON NON MEDICAL REASONS, I.E. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, PLAYSO ACTIONS VIOLATED PLAINTIFF RIGHTS TO EQUAL PROTECTION PER 14 AMENDMENT SEE 198, 52, 54, 21-33, 42-51, 56-65, 174, 175, 340-342, 350-354, 364, 376, 200. ON OR NEAR 7.2.18, SICK CALL, DEFENDANT, LARENE DARLING, NURSE PRACTITIONER: NP, FOR NO RATIONAL REASONS TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF, AND TREATED PLAINTIFF AS A CLASS OF ONE SEE 213, 244, 364, 278, 52, 350-354, ~~200~~. DEFENDANT, DARLING SUCCESSFULLY PROVIDED MEDICAL CARE FOR ALL OTHER INMATES, ESPECIALLY WHITE INMATE BASED ON NON MEDICAL REASONS, I.E. RETALIATED, RACE, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, DARLING ACTION VIOLATED PLAINTIFF RIGHTS TO EQUAL PROTECTION PER 14TH AMENDMENT SEE 27, 42-51, 54-60, 122, 340-342, 364, 376, 201. ON OR NEAR 12.20.18, 12.24.18, AND A UNDATED EVENT, SICK CALL, DEFENDANT, FETTERMAN, CRNP, FOR NO RATIONAL REASON RETALIATION, TARGETED, INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED PLAINTIFF AS A CLASS OF ONE SEE 52, 213, 244, 266, 27, 42-51, 56-60, 213, 122, 370-377, 350-354, 202. DEFENDANT, FETTERMAN, WHILE CONDUCTING THE SAME ASSIGNMENT SUCCESSFULLY PROVIDED ALL OTHER INMATES, ESPECIALLY WHITE INMATES, DENIED PLAINTIFF MEDICAL CARE BASED ON NON ~~REASONAL~~ MEDICAL REASONS, I.E. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, WHICH VIOLATED PLAINTIFF RIGHTS TO EQUAL PROTECTION, PER 14TH AMENDMENT, 203. ON OR NEAR 1.18.19, SICK CALL, DEFENDANT, R. HUTCHINSON, PACS, FOR NO RATIONAL REASONS, TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED PLAINTIFF AS A CLASS OF ONE. SEE 204, 213, 340-341, 350-354, 364, 376, 139-146, 204. DEFENDANT, HUTCHINSON, WHILE CONDUCTING THE SAME SUCCESSFULLY SICK CALL PROVIDED TO ALL OTHER ^{WITH MEDICAL CARE} INMATES, ESPECIALLY WHITE INMATES, BASED ON NON MEDICAL REASONS, I.E. RACE, RETALIATION, PENALTY FOR COMMUNICATING WITH AUTHORITIES DEFENDANT, HUTCHINSON DENIED PLAINTIFF MEDICAL CARE. DEFENDANT, HUTCHINSON ACTIONS VIOLATED PLAINTIFF RIGHTS PER 14TH AMENDMENT SEE 203, 213, 244, 266, 27, 42-51, 56-60, 91-91, 205. ON OR NEAR 3.22.19, 4.12.19, 6.17.19, SICK CALL, DEFENDANT, D. TESTA, FOR NO RATIONAL REASONS TARGETED, RETALIATED/INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF-N-TREATED PLAINTIFF AS A CLASS OF ONE SEE 267, 244, 153, 154, 166, 306, 213, 244, 27, 42-51, 56-60, 206. DEFENDANT, D. TESTA, WHILE CONDUCTING THE SAME SICK CALL, SUCCESSFULLY PROVIDED ALL OTHER INMATES WITH MEDICAL CARE, ESPECIALLY WHITE INMATES, BASED ON NON MEDICAL REASONS, I.E. RACE, RETALIATION, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DENIED PLAINTIFF MEDICAL CARE, DEFENDANT, D. TESTA ACTIONS COMPLAINT: W V. D.

- VIOLATED PLAINTIFF RIGHTS TO EQUAL PROTECTION PER 14th AMENDMENT, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000.
207. ON OR NEAR 11.7.18; 12.19.18; 7.19.19, CONFIDENTIAL INTERVIEWS, DEFENDANT, TICE, WARDEN FOR NO RATIONAL REASONS RETALIATED/INTENTIONALLY DISCRIMINATED-N-TARGETED PLAINTIFF, AND TREATED PLAINTIFF AS A CLASS OF ONE; SEE 138, 208, 209, 213, 217, 220-224, 247, 311
208. DEFENDANT, TICE BEING ACUTELY AWARE THAT PLAINTIFF WAS WAS CURRENTLY BEING MISTREATED BY MEDICAL PROFESSIONALS-N-DOC STAFF UNDER DEFENDANT TICE SUPERVISION, DEFENDANT, TICE WHO SUCCESSFULLY INTERVENE-N-CORRECT MISTREATMENT OF ALL OTHER INMATES, ESPECIALLY WHITE INMATES, BASED ON NON PENOLOGICAL REASONS ENCOURAGED MEDICAL PROFESSIONALS-N-DOC STAFF TO MISTREAT PLAINTIFF, AND HE ALSO TOOK PART IN THE MISTREATMENT SEE 30, 31, 209, 230, 233, 244, 249, 249, 367, 377, 380, 42-60, 31
209. DEFENDANT, TICE, BASED ON NON PENOLOGICAL REASONS, RACE, RELIGIOUS BELIEF, RETALIATED, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DENIED PLAINTIFF RIGHTS GUARANTEED BY THE FIRST AND EIGHTH AMENDMENT, DEFENDANT, TICE SUCCESSFULLY PROVIDED ALL OTHER INMATES, ESPECIALLY WHITE INMATES GUARANTEED BY THE FIRST-N-EIGHTH AMENDMENT. DEFENDANT, TICE ACTIONS-N-ACTIONS VIOLATED PLAINTIFF RIGHTS TO EQUAL PROTECTION PER 14th AMENDMENT
210. ON OR NEAR 12.24.18; 1.17.19; 5.6.19-5.8.19; ACCESS TO MEDICAL CARE, DEFENDANT, B.P. HYDE (ALSO ON OR NEAR 8.7.18, 17; 8.11.17; 9.27.17; 12.28.17) FOR NO RATIONAL REASONS TARGETED, INTENTIONALLY DISCRIMINATED, RETALIATED AGAINST PLAINTIFF AND TREATED PLAINTIFF AS A CLASS OF ONE SEE 27, 30, 40, 60, 42, 143, 147, 159-162, 211, 283, 340-342, 350-354, 364, 367, 376, 31
211. DEFENDANT, B.P. HYDE WHILE PROVIDING ACCESS TO MEDICAL CARE-N-SPECIALISTS SUCCESSFULLY TO ALL OTHER INMATES WHO SIGNED UP/SUBMITTED SICK CALL REQUEST, AND THOSE RECOMMENDED FOR SPECIALISTS, ESPECIALLY WHITE INMATES, BASED ON NON MEDICAL REASONS DEFENDANT, B.P. HYDE DENIED PLAINTIFF ACCESS TO MEDICAL CARE-N-SPECIALIST, DEFENDANT, B.P. HYDE ACTIONS VIOLATED RIGHTS TO EQUAL PROTECTION PER 14th AMENDMENT SEE 21-27, 30, 31, 35-37, 29-33, 40-40, 46, 67, 70-71, 269

COUNT THREE: FREE SPEECH

212. PLAINTIFF ALLEGES AND INCORPORATES PARAGRAPHS 1 - 211
213. DEFENDANTS K, DELISMA, WILLIAM L. BOWERS, PHILLIP MAUST, HEIDI SROKA, ROBERT SNYDER, R. PESCHOCK, J. ADONE, ELLIS KAUFFMAN, RICHARD IRWIN, ROX-ANNE PLAYSO, LARENE DARLING, FETTERMAN, R. HUTCHINSON, D. TESTA, ERIC TICE, B. P. HYDE BY THREATENING PLAINTIFF WITH VIOLENCE, DENIAL MEDICAL CARE-N-EQUAL PROTECTION DUE TO PLAINTIFF EXERCISE OF PLAINTIFF RLUIPA RIGHTS; PRACTICE OF RELIGIOUS BELIEFS; RIGHT TO REDRESS THE PRISON THROUGH USE OF PRISON GRIEVANCE SYSTEM PASSIM 21-367
214. DEFENDANTS, WILLIAM L. BOWERS, PHILLIP MAUST, HEIDI SROKA, ROBERT SNYDER, ERIC TICE DENIED PLAINTIFF RLUIPA RIGHTS, AND RELIGIOUS PRACTICE, STILL ON GOING TO DATE! SEE 217-224, 228, 229, 236, 237, 240, 243, 244, 247-258, 31
215. IN A PRIOR SETTLEMENT AGREEMENT, WASHINGTON V. KLEM, THE DOC AGREED TO PROVIDE PLAINTIFF WITH ALL RELIGIOUS LITERATURE NEEDED TO CONDUCT COMPLAINT: W V D

- THE DAILY RITUAL OF PLAINTIFF RELIGIOUS BELIEFS.
216. PLAINTIFF IS FOUNDER AND LEADER OF THE CHILDREN OF THE SUN CHURCH, THEIR BELIEFS DICTATES A DAILY READING OF FOUR DIFFERENT SPIRITUALLY INSPIRED AFROKENTRIK BOOKS OR LITERATURE ON A DAILY BASIS. TO DATE! DEFENDANTS, P. MAUST, W. L. BOWERS-N-E, TICE, (CHAPLAIN, A BLOCK UNIT MANAGER-N-WARDEN) ARE CONTINUING TO DENY PLAINTIFF HIS RELIGIOUS BOOKS-N- LITERATURE NEEDED TO PERFORM THE FOREMENTION DAILY RITUALS. ^{SEE: 217-244, 248-258; 271, 272, 344, 349, 351, 355, 356, 359, 373, 374, 376}
217. DEFENDANTS, P. MAUST-CHAPLAIN, W. L. BOWERS-A BLOCK UNIT MANAGER, AND E. TICE-WARDEN CONTINUE TO DENY PLAINTIFF ACCESS TO PLAINTIFF RELIGIOUS LITERATURE, STILL ON GOING TO DATE! BASED ON NON PENOLOGICAL REASONS, I.E. RACE, RETALIATION, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES ^{SEE: 349, 355, 340, 344}
218. DEFENDANT, P. MAUST, ON GOING TO DATE! BASED ON NON PENOLOGICAL REASONS, I.E. RACE, RETALIATION, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES.
219. DEFENDANT, W. L. BOWER, UNIT MANAGER, STILL ON GOING TO DATE! BASED ON NON PENOLOGICAL REASONS, I.E. RACE, RETALIATION, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES ^{SEE: 364, 367, 365}
220. DEFENDANT, E. TICE, WARDEN, STILL ON GOING TO DATE! BASED ON NON PENOLOGICAL REASONS, I.E. RACE, RETALIATION, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES.
221. DESPITE RLUIPA MANDATE TO ENFORCE THE LEAST RESTRICTIVE MEANS CONCERNING PROVIDING PLAINTIFF RELIGIOUS NEEDS. DEFENDANTS, W. L. BOWERS, P. MAUST, N-E. TICE REPEATEDLY DENIED PLAINTIFF ACCESS TO PLAINTIFF OWN RELIGIOUS LITERATURE ^{SEE: 31}
- N.B. DEFENDANTS, BOWERS, MAUST-N-TICE ARE STILL DOING SO TO DATE! WHICH ~~MAKES~~ STILL CONTINUES TO MAKE IT IMPOSSIBLE FOR PLAINTIFF TO PRACTICE HIS RELIGIOUS BELIEFS ^{SEE: 31}
222. DEFENDANTS, E. TICE, W. L. BOWERS-N-P. MAUST OPENLY PROFESSED SEVERAL TIMES THAT PLAINTIFF HAVING SUED SOL-BRENE DOC STAFF-OR MEDICAL PROFESSIONALS; SOL-SOMERSET DOC-STAFF-N-MEDICAL PROFESSIONALS; OR THEIR FAMILY MEMBERS; AND BRIEVANCES FILED AGAINST DEFENDANTS, TICE, BOWERS-N-MAUST; AND PLAINTIFF CONTINUOUS COMMUNICATIONS WITH AUTHORITIES IS WHY DEFENDANTS, TICE, BOWERS-N-MAUST DENIED, AND CONTINUE TO DATE! TO DENY PLAINTIFF TO PRACTICE HIS RELIGIOUS BELIEFS ^{SEE: 217, 340-374, 364, 369, 31}
223. PLAINTIFF, THE FOUNDER-N-LEADER OF THE "CHILDREN OF THE SUN" CHURCH WHO'S BELIEFS MANDATES THAT PLAINTIFF READ FROM FOUR DIFFERENT BOOKS PER DAY BY FOUR DIFFERENT AUTHORS THAN THOSE PLAINTIFF HAS READ WITHIN THE PAST FOUR DAYS; DEFENDANTS, P. MAUST, E. TICE-N- W. L. BOWERS BRAGGED-N-BOASTED ABOUT DEPRIVING PLAINTIFF ACCESS TO PLAINTIFF AFROKENTRIK LITERATURE CAUSING IT TO BE IMPOSSIBLE FOR PLAINTIFF TO PRACTICE THE "DAILY" RITUAL OF PLAINTIFF RELIGIOUS BELIEFS ^{SEE: 237, 242, 250, 271, 272, 281, 252-254, 341, 349, 355, 356}
224. DEFENDANTS, BOWERS, MAUST-N-TICE, DECLARED, "THERE'S NOTHING ABOUT AFRIKANS TO WORSHIP, "AFRIKA HAS NO GOD", "CHILDREN OF THE SUN" WHO THE HELL ARE THEY" "THE CHILDREN OF THE SUN CHURCH" FOUNDER-N-FOLLOWERS ARE UNDESERVING TO BE GRANTED ACCESS TO THEIR RELIGIOUS LITERATURE, "CHILDREN OF THE SUN CHURCH" IS NOT RELIGION, WHILE PROVIDING ACCESS TO RELIGIOUS LITERATURE TO ALL OTHER INMATES ON THE POD, ESPECIALLY WHITE INMATES AND OR NON CHILDREN OF THE SUN CHURCH
- COMPLAINT: W. V. D.

BELIEVERS; DEFENDANTS, BOWERS, MAUST-N-ICE CONTINUES TO DENY PLAINTIFF ACCESS TO PLAINTIFF RELIGIOUS LITERATURE BASED ON NON PENOLOGICAL REASONS, I.E. RACE, RETALIATION, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, WHILE PROVIDING IT OTHERS, ESPECIALLY WHITES. SEE: 21, 40, 27, 250-254, 271, 272, 340-342, 349, 355, 356, 369, 376

225. ANGERED BY PLAINTIFF HAVING SUED THEM PERSONALLY, I.E. DEFENDANTS, WIL BOWERS, P. MAUST, REQUEST TO STAFF, AND FILED GRIEVANCES, ON OR NEAR 1.9.18; 4.9.18; 9.10.19; DEFENDANT, BOWERS DENIED PLAINTIFF POSSESSION OF HIS RELIGIOUS LITERATURE WHICH MADE IT IMPOSSIBLE FOR PLAINTIFF TO PRACTICE HIS RELIGIOUS BELIEFS TO DATE! WHEREBY DEFENDANT, BOWERS NON COMPLIANCE TO RLUIPA MANDATE OF THE LEAST RESTRICTIVE MEANS. SEE: 238, 239, 226-229, 183, 217, 221-224, 236, 244, 255-258, 340-342, 351, 355, 369, 376, 27

226. ON OR NEAR 8.2.17; DEFENDANT, P. MAUST, CHAPLAIN, ACCESS TO RELIGIOUS LITERATURE, DEFENDANT, MAUST DENIED PLAINTIFF RELIGIOUS LITERATURE NEEDED TO PRACTICE PLAINTIFF RELIGIOUS BELIEFS; SMOKE TO PLAINTIFF IN GESTURE OF CONTEMPT-N-AS IF HAVING A WANT TO PHYSICALLY STRIKE PLAINTIFF, USING WORDS LADEN-N WITH RACIST-OVERTONES CAUSING PLAINTIFF TO FEAR FOR HIS LIFE. SEE: 183, 21, 173-176, 218, 227-229, 255-258, 351, 369;

227. ON OR NEAR 8.2.17, CONTINUING TO DATE! SAME EVENT, DEFENDANT, MAUST DENIAL OF PLAINTIFF RELIGIOUS LITERATURE FOR THE PAST 760 PLUS STRAIGHT DAYS TO DATE! DEFENDANT, MAUST CONTINUOUSLY CAUSE PLAINTIFF THE INABILITY TO PRACTICE HIS 'DAILY' RELIGIOUS BELIEFS, DEFENDANT, MAUST ACTIONS VIOLATED PLAINTIFF FREE SPEECH OF RELIGION, AND RIGHTS TO THE LEAST RESTRICTIVE MEANS; BASED ON NON PENOLOGICAL INTEREST PER RLUIPA. 42 USC 2000cc 1-5; 18 USC 1382 247; FIRST AMENDMENT. SEE: 251, 369, 229

228. ON OR NEAR 8.2.17 ONGOING TO DATE! SAME EVENT, DEFENDANT, MAUST NON COMPLIANCE TO RLUIPA, WHICH MANDATES THE LEAST RESTRICTIVE MEANS; BASED ON NON PENOLOGICAL REASONS I.E. RACE, RETALIATIONS, RELIGIOUS BELIEFS, PENALTY FOR COMMUNICATIONS WITH AUTHORITIES, DENIED PLAINTIFF 760 PLUS STRAIGHT DAYS ONGOING TO DATE! OF "DAILY" RELIGIOUS PRACTICE, DEFENDANT, MAUST ACTIONS CONSTITUTES FREE SPEECH-N-RLUIPA UNDER 42 USC 2000cc 1-5; 18 USC 1382 247; FIRST AMENDMENT. SEE: 21, 172-176, 251, 369

229. ANGERED BY PLAINTIFF HAVING SUBMITTED REQUEST TO STAFF, AND FILED A GRIEVANCE AGAINST DEFENDANT, MAUST PERSONALLY, DEFENDANT, MAUST CONTINUE TO DENY PLAINTIFF RELIGIOUS LITERATURE, WHICH MAKES IT IMPOSSIBLE FOR PLAINTIFF TO PRACTICE HIS RELIGIOUS BELIEFS TO DATE! WHEREBY DEFENDANT, MAUST NON COMPLIANCE TO RLUIPA MANDATE OF THE LEAST RESTRICTIVE MEANS, DEFENDANT, MAUST ACTIONS CONSTITUTE RELIGIOUS FREE SPEECH-N-RLUIPA VIOLATIONS PER 42 USC 2000cc 1-5; 18 USC 1382 247; 1st AMEND.

230. ON OR NEAR 12.3.08, WHILE HOUSED IN HUNTINGTON RHU, HAVING FOUR BOXES OF RELIGIOUS-N-LEGAL PROPERTY IN PLAINTIFF CELL, AND SEVEN BOXES OF RELIGIOUS-N-LEGAL PROPERTY STORED IN SC-HUNTINGTON RHU PROPERTY ROOM. PLAINTIFF AND DOC ENJOINED IN THE WASHINGTON V. KLEW SETTLEMENT AGREEMENT, WHERE PLAINTIFF AND DOC DRAFTED THESE WORDS INTO THE SETTLEMENT N.B. "MR. WASHINGTON MAY RETAIN ONE FOOT LOCKER AND THREE OF HIS SEVEN RECORD-CENTER BOXES IN HIS CELL WHILE HE IS HOUSED IN THE GENERAL POPULATION"

231. SAME EVENT, 12.3.08, TO ENSURE THAT PLAINTIFF WOULD HAVE NINE BOXES COMPLAINT: W V. D

OF PROPERTY WHEN PLAINTIFF WAS RELEASED FROM THE RHM, TO COMPLY WITH WHAT PLAINTIFF-N-DOR HAD ALREADY AGREED TO, i.e. MR. WASHINGTON WILL BE PERMITTED TO POSSESS THE NINE STORAGE BOXES OR EQUIVALENT, IN LIGHT OF SCI-HUNTINGDON WANTING TO WITHHOLD FIVE BOXES OF PLAINTIFF PROPERTY BECAUSE PLAINTIFF ALREADY HAD FOUR BOXES INSIDE OF PLAINTIFF CELL, LEAVING TWO IN THE PROPERTY ROOM

232. ALL OF THE DICTATES OF THE WASHINGTON V. KLEM SETTLEMENT AGREEMENT WAS FULLY ENFORCED BY STAFF, INCLUDING SCI-SOMERSET RHM STAFF FOR 99-STRAIGHT MONTHS AT THAT TIME; THEN BASED ON NON PENOLOGICAL INTEREST, i.e. RACE, RELIGIOUS BELIEFS, COMMUNICATIONS WITH AUTHORITIES; PLAINTIFF WOULD NOT SIGN OFF ON BRIEVANCES, DEFENDANTS, P. MAUST, W. L. BOWERS, E. TICE, R. SNYDER, H. SROKA DISREGARDED-N-RE-INTERPRETED THE SETTLEMENT AGREEMENT FOR THE SAKE OF DENYING PLAINTIFF HIS RELIGIOUS-N-LEGAL PROPERTY ALREADY APPROVED BY THE SOMERSET ADMINISTRATION, THE WASHINGTON V. KLEM SETTLEMENT AGREEMENT, WHICH MANDATES THE ENFORCEMENT OF THE LEAST RESTRICTIVE MEANS ^{SEE: 225, 234-236, 248, 215, 227, 31;}

233. BECAUSE THE WASHINGTON V. KLEM SETTLEMENT AGREEMENT ONLY DICTATES THAT IF PLAINTIFF NEED TO POSSESS INSIDE OF HIS CELL MORE THAN THE AMOUNT OF PROPERTY ALLOWED BY THE AGREEMENT BECAUSE OF LITIGATION, HE MAY PETITION THE SUPERINTENDENT FOR PERMISSION TO POSSESS EXCESS PROPERTY INSIDE OF HIS CELL

234. NO. B. FOR 18 STRAIGHT MONTHS SCI-SOMERSET WAS IN COMPLIANCE WITH THE WASHINGTON V. KLEM SETTLEMENT, AND ONLY AFTER/WHEN PLAINTIFF DID NOT SIGN OFF ON BRN # 659236, WHICH PLAINTIFF FILED AGAINST SCI-SOMERSET STAFF; DID DEFENDANTS, DECLARE THEY WERE DISREGARDING THE DICTATES OF WASHINGTON V. KLEM SETTLEMENT, PP. 7-8; IN ACCORD WITH THE OTHER PRISONS FOR THE PAST ~~87~~ STRAIGHT MONTHS AS OF 7.14.15, i.e. THE LEAST RESTRICTIVE MEANS; AND SCI-SOMERSET APPROVAL FOR PLAINTIFF TO POSSESS EXCESS PROPERTY ^{SEE: 232, 355, 273, 215, 227, 236}

235. ON OR NEAR 7.14.15, PLAINTIFF ARRIVED AT SCI-SOMERSET WITH 16 BOXES OF RELIGIOUS-N-LEGAL LITERATURE, WHAT FOLLOWED WAS SCI-SOMERSET ADMINISTRATION IMMEDIATELY ARRIVED PLAINTIFF POSSESSION OF EXCESS PROPERTY; NINE BOXES INSIDE PLAINTIFF CELL, AND ALL OVERFLOW REMAINED STORED IN R-N-D, SCI-SOMERSET ADMINISTRATION'S RULING WAS BASED ON THE DICTATES OF WASHINGTON V. KLEM SETTLEMENT, PP. 5, 7-8; IN ACCORD WITH OTHER PRISONS FOR THE PAST 87-STRAIGHT MONTHS, AS OF 7.14.15, i.e. THE LEAST RESTRICTIVE MEANS

236. SCI-SOMERSET SUCCESSFULLY COMPLIED WITH THE DICTATES OF THE WASHINGTON V. KLEM SETTLEMENT FOR 18 STRAIGHT MONTHS; ACCORDING TO DEFENDANTS, W. BOWERS, P. MAUST, R. SNYDER, HEIDI SROKA-N-E. TICE, BECAUSE PLAINTIFF DID NOT SIGN OFF ON BRN # 659236, THE DICTATES OF WASHINGTON V. KLEM SETTLEMENT AGREEMENT, AND SCI-SOMERSET ADMINISTRATION APPROVAL TO POSSESS EXCESS PROPERTY, THE LEAST RESTRICTIVE MEANS ON GOING TO DATE! ARE DISCARDED ^{SEE: 225, 227, 215, 228-233;}

237. DEFENDANTS, H. SROKA, R. SNYDER, P. MAUST, W. BOWERS-N-E. TICE, USED, AND CONTINUE TO DATE! TO USE THE MOST RESTRICTIVE MEANS TO DENY PLAINTIFF HIS RELIGIOUS COMPLAINT: W. V. D

238. WITHOUT THE RELIGIOUS LITERATURE PLAINTIFF CANNOT PRACTICE HIS RELIGIOUS BELIEFS I.E. READING FROM FOUR DIFFERENT BOOKS BY FOUR DIFFERENT AUTHORS THAN PLAINTIFF READ WITHIN THE PAST FOUR DAYS CONCERNING SUBJECT MATTERS, EVENTS, KINGDOMS, EMPIRES, PERSONALITIES, ETC. THAN THOSE READ ABOUT IN THE PAST FOUR DAYS; PLAINTIFF NEEDS TO PRAY OVER THE RELIGIOUS LITERATURE BEFORE AND AFTER READING; AND WHEN ALLOWED THE LITERATURE IS SET THE RISING SUN PRIOR TO READING

239. PLAINTIFF RELIGIOUS LITERATURE-N-THE ~~REWARD~~ RITUAL ARE ONE-N-THE SAME

240. DEFENDANTS, R. SNYDER, H. SROKA, W. BOWERS, E. TICE-N-A MAUST DENIAL OF THE LEAST RESTRICTIVE MEANS IS A VIOLATION OF RLUIPA, 42 USC 2000 CC, 1-5; 18 USC 1377; FIRST AMENDMENT, WHICH TO DATE! HAS CONTINUED TO PLACE A BURDEN ON PLAINTIFF RELIGIOUS BELIEFS; EVEN IF THE BURDEN RESULTS FROM A RULE OF GENERAL APPLICABILITY 241. 42 USC 2000 CC-3; MANDATES THE ACT SHALL BE CONSTRUED IN FAVOR OF A BROAD PROTECTION OF RELIGIOUS EXERCISE, TO THE MAXIMUM EXTENT PERMITTED BY THE ~~TERMS~~ TERMS OF THIS ACT AND CONSTITUTION

242. PLAINTIFF, FOUNDER AND LEADER OF THE CHILDREN OF THE SUN CHURCH, WHERE BOOKS ARE NEEDED TO FULFILL PLAINTIFF MISSIONARY WORK

243. DEFENDANT, P. MAUST, W. BOWERS, TICE, E.; R. SNYDER, R. AND H. SROKER ACTIONS INFLECTED IRREPARABLE HARM TO PLAINTIFF WHEREIN PLAINTIFF TO DATE! CONTINUES TO SUFFER ON BEING LOSS OF REWARDS IN THE AFTERLIFE. SEE 237, 341, 369

244. DEFENDANTS, K. DELISMA, WILLIAM BOWERS, PHILLIP MAUST, HEIDI SROKA, ROBERT SNYDER, R. PESCHOCK, J. BIRONE, ELLIS KAUFFMAN, RICHARD IRWIN, ROXANNE PLAYSO, LARENE DONNELLY, FETTERMAN, R. HUTCHINSON, D. TESTA, E. TICE, B. P. HYDE, SAME SERIES OF EVENTS, CONCERNING THE SAME LAWS, RETALIATIONS AGAINST PLAINTIFF UNLAWFULLY, IN VIOLATIONS OF PLAINTIFF RIGHTS UNDER FIRST AMENDMENT, THE ALLEGED ACTS ARE ALLEGED TO HAVE CAUSED PLAINTIFF INJURY TO PLAINTIFF FIRST AMENDMENT-N-RLUIPA RIGHTS SEE 131

245. DEFENDANT, H. SROKA, WARDEN'S ASSISTANT-N-BRIEVANCE COORDINATOR, BY WITH-ESSING-N-BEING ACUTELY AWARE OF THE MISCONDUCT OF DEFENDANTS WILLIAM BOWERS, P. MAUST, R. SNYDER, RICHARD IRWIN, R. PLAYSO, R. HUTCHINSON, B. P. HYDE, AND BY DEFENDANT, SROKA FAILING TO CORRECT THAT MISCONDUCT; AND ENCOURAGED THE CONTINUATION OF THAT MISCONDUCT DEFENDANT, SROKA IS ALSO VIOLATIONS OF PLAINTIFF RIGHTS UNDER FIRST AMENDMENT, THE ALLEGED ACTS ARE ALLEGED TO HAVE CAUSED PLAINTIFF INJURY TO PLAINTIFF FREE SPEECH-N-RLUIPA GUARANTEED 42 USC 2000 CC 1-5; 18 USC 1377; FIRST AMENDMENT SEE 131, 2740, 340, 341, 342, 31

246. DEFENDANT, H. SROKA, BRIEVANCE COORDINATOR, REGULARLY-N-CONSISTENTLY REFUSED TO RESPOND TO PLAINTIFF TIMELY SUBMITTED BRIEVANCE THAT REQUESTED RELIEF OF MONETARY DAMAGES-N-REQUEST TO STAFF; HINDERED, STYMIED, PREVENTED-N-DENIED PLAINTIFF THE EXERCISE OF HIS RIGHTS TO SEEK REDRESS FROM DEFENDANTS THROUGH USE OF THE IN-MATE GRIEVANCE SYSTEM: DC-ADM 804 POLICY; DEFENDANT, SROKA ACTIONS UNLAWFULLY IN COMPLAINT: WV.D

VIOLATION OF PLAINTIFF FIRST AMENDMENT RIGHT OF FREE SPEECH, THESE ILLEGAL ACTIONS CAUSED PLAINTIFF INJURY TO PLAINTIFF FREE SPEECH GUARANTEED UNDER THE FIRST AMENDMENT, AND CONSTITUTED RETALIATION SEE 174-175; 31

247. ON OR NEAR 10.14.15; 2.10.16; 8.22.16; DURING CONFIDENTIAL INTERVIEWS DEFENDANT, H. SROKA, DECLARED WHEN PLAINTIFF REQUESTED WHY DEFENDANT, SROKA WAS NOT RESPONDING TO HIS MANY TIMELY SUBMITTED GRIEVANCES, SPEAKING AS IF SHE WAS SCOLDING PLAINTIFF, "ABSOLUTELY NO FAULTS NOR SHORT COMINGS WERE DISCOVERED IN ANY OF THE ORIGINAL GRIEVANCES PLAINTIFF FILED; OTHERWISE SHE WOULD HAVE REJECTED EACH AND EVERY ONE OF THEM," PLAINTIFF ASKED WHY DIDNT SHE RESPOND TO ANY OF THE GRIEVANCES WHERE PLAINTIFF REQUESTED MONETARY RELIEF. DEFENDANT, SROKA, DECLARED, "THERE WAS NO NEED FOR PLAINTIFF TO MAKE SUCH A REQUEST," "BY PLAINTIFF DOING SO ONLY CREATES ANTIMOSITY BETWEEN STAFF AND INMATE," AND "IN THE FUTURE SHE WOULD NOT RESPOND TO EVERY GRIEVANCE REQUESTING MONETARY RELIEF," NON OF PLAINTIFF REQUEST TO HER CONCERNING HER NOT RESPONDING TO PLAINTIFF GRIEVANCES SEE: 40; 41; 39; 74; 215; 232-236; 245; 340; 349; 364; 31

248. SAME ISSUE, ON ~~OR NEAR~~ OR NEAR 11.7.18; 12.19.18; 7.19.19; DEFENDANT, E. TICE, WARDEN, WHEN PLAINTIFF MADE HIM AWARE THAT ~~PLAINTIFF~~ PLAINTIFF WAS BEING DENIED THE LEAST RESTRICTIVE MEANS, DEFENDANT, TICE OPENLY PROFESSED WASHINGTON V. KLEW, SETTLEMENT AGREEMENT ONLY SAYS THAT ON PAPER, THAT JUDGE RUNS HIS COURT, BUT HE (DEFENDANT, TICE) RUNS THIS PRISON, BECAUSE NO JUDGE ^{CAN} EVER GIVE A BLACK MAN RIGHTS A WHITE MAN WILL RESPECT, AND HE WAS NOT ABOUT ^{TO} COMPLY TO WASHINGTON V. KLEW, SETTLEMENT, WHICH MANDATES THE ENFORCEMENT OF THE LEAST RESTRICTIVE MEANS, SEE: 41; 59; 35; 40; 74; 215-225; 31

249. ON OR NEAR 11.7.18; 12.19.18; 7.19.19; SAME ISSUES, DEFENDANT, E. TICE, DECLARE HE WAS AWARE OF THE DICTATES OF WASHINGTON V. KLEW, SETTLEMENT, PP. 5, 7-8, WHICH PROVIDES PLAINTIFF IS ALLOWED EXCESS PERSONAL PROPERTY. ACCORDING TO DEFENDANT, TICE, HE WAS PENALIZING PLAINTIFF FOR ALWAYS FILING GRIEVANCES, BEING DISRESPECTFUL IN REFUSING TO SIGN OFF ON A GRIEVANCE, PLAINTIFF RELIGIOUS BELIEFS, RACE, AND ON BEING COMMUNICATION ^{WITH} ~~THE~~ AUTHORITIES i.e. BASED ON NON PENOLOGICAL REASONS, DEFENDANT ACTIONS CONSTITUTED FREE SPEECH-N-RLUIPA VIOLATIONS UNDER 42 USC 2000c, 1-5; 18 USC 1333 247; FIRST AMENDMENT SEE: 41; 59; 40; 35; 74; 215-225; 31

250. ON OR NEAR 1.9.18, RELIGIOUS LITERATURE, DEFENDANT, W. L. BOWERS, UNIT MANAGER DENIAL OF THE LEAST RESTRICTIVE MEANS HAS MADE THE DAILY PRACTICE OF PLAINTIFF RELIGIOUS BELIEFS IMPOSSIBLE, PLAINTIFF RELIGIOUS AND RELIGIOUS LITERATURE ARE ONE AND THE SAME, THEREFORE, DEFENDANT, BOWERS DENIED PLAINTIFF POSSESSION OF HIS RELIGIOUS LITERATURE, DEFENDANT, BOWERS ALSO DENIED PLAINTIFF THE "DAILY" PRACTICE OF HIS RELIGIOUS BELIEFS SEE: 41; 59; 39; 40; 74; 215-225

251. SAME EVENT, DEFENDANT, BOWERS DENIAL OF THE LEAST RESTRICTIVE MEANS DID NOT MERELY DENY PLAINTIFF ONE OR TWO DAYS TO PRACTICE HIS RELIGIOUS BELIEFS. TO DATE! IT HAS BEEN MORE THAN 900 STRAIGHT DAY-N- STILL COUNTING, THIS COULD HAVE EASILY BEEN AVOIDEN WITH COMPLIANCE OF THE LEAST RESTRICTIVE MEANS, PER RLUIA. ACCORDING TO DEFENDANT, BOWERS, DENIAL OF RELIGIOUS

COMPLAINT: W. V. D

- LITERATURE WAS DUE TO PLAINTIFF FILING OR DEMANDING AGAINST HIM, I.E. NON PENOLOGICAL INTEREST. DEFENDANT, BOWERS ACTIONS CONSTITUTED FREE SPEECH-N-RULIA RIGHTS UNDER 42 USC 2000cc, 1-5; 18 USC 1331 247, FIRST AMENDMENT SEE: 227, 269
252. ON OR NEAR 4.8.17, FAILURE TO ACT, DEFENDANT, R. SNYDER, CAPTAIN OF SECURITY, AIDED-N-ABETTED TWO WHITE INMATES TO SUCCESSFULLY STEAL-N-TRADE PLAINTIFF RELIGIOUS BOOKS FOR DRUGS. PLAINTIFF REPEATEDLY MADE DEFENDANT SNYDER AWARE SEVERAL TIMES OVER VIA CONFIDENTIAL INTERVIEWS-N-REQUEST TO STAFF DEFENDANT, SNYDER FOR SEVERAL WEEKS RESPONDED "SURE, THE WHITE MAN STOLE YOUR RELIGIOUS BOOKS" "BLACKS ALWAYS CLAIM WHITES ROBBED THEM" SEE: 186, 272)
253. SAME EVENT, 4.8.17, DEFENDANT, R. SNYDER, HAVING BEEN MADE AWARE SEVERAL TIMES OVER DEFENDANT, SNYDER NOT ACTING FOR MORE THAN 30-DAYS ALLOWED THE TWO ALREADY IDENTIFIED WHITE MALES, WHO HAD ALREADY ADMITTED THEY STOLE PLAINTIFF BOOKS, TO HIDE PLAINTIFF BOOKS WITH THEIR FRIENDS, THE EXCHANGE THE BOOK FOR DRUGS.
254. SAME EVENT, 4.8.17, DEFENDANT, R. SNYDER RESPOND IMMEDIATE TO PROVIDE SAFETY-N-PROTECTION TO OTHER INMATES, ESPECIALLY WHITE INMATES, BASED ON NON PENOLOGICAL INTEREST, I.E. RACE, RELIGIOUS BELIEFS, NOT SIGNING OFF ON EVANCE #059236, COMMUNICATIONS WITH AUTHORIZES. DEFENDANT, SNYDER DELAYED. THE LOST OF RELIGIOUS BOOKS PLACED A BURDEN ON PLAINTIFF RELIGIOUS PRACTICE OF HIS RELIGIOUS BELIEFS, DEFENDANT, SNYDER ACTIONS-N-NON ACTION CONSTITUTED FREE SPEECH, RULIA-N-CRUEL AND UNUSAL PUNISHMENT VIOLATIONS-N-EQUAL PROTECTION VIOLATIONS PER 42 USC 2000cc, 1-5; 18 USC 1331 247, FIRST-N-EIGHTH AMENDMENTS SEE: 251, 355, 364, 369, 374, 272
255. ON OR NEAR 8.5.17, CONTINUING TO DATE! RELIGIOUS LITERATURE, DEFENDANT, P. MAUST, CHAPLAIN PROVIDED ALL OTHER INMATES, ESPECIALLY WHITE INMATES, AND/OR NON CHILDREN OF THE SUN CHURCH BELIEVERS, WITH PRIVISIONS "FREE OF CHARGE" IRRESPECT OF THE AMOUNT OF RELIGIOUS LITERATURE CONCERNING THEIR RELIGIOUS BELIEFS. IRRESPECT OF AVAILABILITY IN THE MAIN LIBRARY, BASED ON NON RELIGIOUS INTEREST, DEFENDANT, MAUST DENIED PLAINTIFF REQUEST FOR RELIGIOUS LITERATURE READILY AVAILABLE, CONCERNING PLAINTIFF RELIGIOUS BELIEFS, I.E. PERTAINING TO AFRIKA-N-AFRIKAN PEOPLE SEE: 183, 215-245, 256-258, 364
256. 8.5.17, SAME EVENT, DEFENDANT, P. MAUST, DENIED PLAINTIFF A INDIGENT INMATE RELIGIOUS LITERATURE NOT IN THE MAIN LIBRARY, CONTINUING TO DATE! ACCORDING TO DEFENDANT, MAUST, BECAUSE THE RELIGIOUS LITERATURE PLAINTIFF REQUESTED CONCERNED FACTS ABOUT AFRIKA-N-AFRIKAN PEOPLE, IT IS NOT RELIGIOUS LITERATURE, THEREFORE, DEFENDANT, MAUST DECLARED HE DIDN'T HAVE TO PROVIDE PLAINTIFF WITH IT.
257. SAME EVENT, 8.5.17-CONTINUING TO DATE! DEFENDANT, P. MAUST DENIED PLAINTIFF RELIGIOUS LITERATURE WHICH DEFENDANT, MAUST HAS READILY AVAILABLE ACCESS TO AN INEXHAUSTIBLE RELIGIOUS LITERATURE SUPPLY, DEFENDANT, MAUST DID NOT USE THE LEAST RESTRICTIVE MEANS, DEFENDANT, MAUST DENIAL OF RELIGIOUS LITERATURE PLACED A BURDEN ON THE DAILY PRACTICE OF PLAINTIFF RELIGIOUS BELIEFS.

DEFENDANT, MAUST ACTIONS CONSTITUTED FREE SPEECH - N- RETALIATION PER 42 USC 2000cc, 1-5; 18 USC 1337 247; FIRST AMENDMENT

258. SAME EVENT, 8.5.17 - ONGOING TO DATE! DEFENDANT, MAUST DECLARED IF PLAINTIFF HAD NOT SUED ALL SCI-GREENE COUNTY STAFF, REFUSED TO SIGN OFF ON GRN # 659236; AND CONTINUOUSLY COMMUNICATED WITH AUTHORITIES, DEFENDANT, MAUST WOULD PROVIDE PLAINTIFF WITH RELIGIOUS LITERATURE UPON REQUEST. DEFENDANT, MAUST ACTIONS CONSTITUTED FREE SPEECH - N- RLUIPA VIOLATIONS PER 42 USC 2000 cc, 1-5; 18 USC 1337 247; FIRST AMENDMENT.

259. ON OR NEAR 11.27.18; 12.13.18; 2.8.19; 4.2.19; 5.30.19; 6.17.19; 8.1.19; 9.5.19; 10.2.19, SEE 130, 131, 164, 170, 52, 154, 270, 172-173, 174-176, 40, 340-342, 376, 47

DEFENDANT, K. DELISMA, DR. - N- MEDICAL DIRECTOR, SICK CALL, RATIONALE FOR HIS DELIBERATE INDIFFERENCE TO PLAINTIFF CHRONIC AILMENTS WAS THE PENALTY FOR PLAINTIFF HAVING FILED GRIEVANCE AGAINST DEFENDANT, DELISMA; PLAINTIFF HAVING SUE MEDICAL STAFF CURRENTLY UNDER HIS SUPERVISION; AND PLAINTIFF COMMUNICATIONS WITH AUTHORITIES. DEFENDANT, DELISMA ACTIONS CONSTITUTE FREE SPEECH CONSPIRACY - N- RETALIATION VIOLATIONS PER FIRST AMENDMENT; 42 USC 1985 SEE: 132, 135, 21, 29, 33, 35, 39-41, 43-60, 62, 170-172, 363, 374

260. ON OR NEAR 1.15.18; SICK CALL; DEFENDANT, J. GIRONE, DOCTOR, PROFESSED PENALIZING PLAINTIFF FOR HAVING SUE MEMBERS OF SCI-SOMERSET MEDICAL STAFF, FILING GRIEVANCES, CONTINUOUS COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, GIRONE ACTIONS VIOLATED PLAINTIFF FREE SPEECH RIGHT PER FIRST AMENDMENT; 42 USC 1985 SEE 114, 52, 193, 274, 351, 352, 338-342, 363, 364, 376, 27, 40

261. ON OR NEAR 4.3.18; 11.6.18; 11.20.18; 12.4.18; 2.4.19; 3.13.18; SICK CALL, DEFENDANT, E. KAUFFMAN, DOCTOR; RATIONALE WAS HE WAS PUNISHING PLAINTIFF FOR FILING A GRIEVANCE AGAINST HIM, AND LAWSUITS AGAINST DEFENDANT, KAUFFMAN, - N- COMMUNICATION WITH AUTHORITIES, EVEN DARED PLAINTIFF TO SUE DEFENDANT, KAUFFMAN, DEFENDANT, KAUFFMAN ACTIONS CONSTITUTED FREE SPEECH VIOLATION PER FIRST AMENDMENT; 42 USC 1985 SEE: 118, 52, 27, 40, 132, 195, 275, 172, 351, 352, 338-342, 363, 364, 376

262. ON OR NEAR 10.18.17 AND 2.19.19, EYE EXAM, DEFENDANT, R. IRWIN, OPTOMETRIST, RETALIATED, ACCORDING TO DEFENDANT, IRWIN, PLAINTIFF CONTINUOUSLY COMMUNICATION WITH AUTHORITIES WHICH INCLUDED COMPLAINING OF DEFENDANT, IRWIN, FILED A GRIEVANCE AGAINST DEFENDANT, IRWIN, HABITUALLY FILING GRIEVANCES - N- LAWSUITS AGAINST DEFENDANT, IRWIN CO-WORKER IN THE MEDICAL DEPARTMENT, CHALLENGED PLAINTIFF TO SUE DEFENDANT IRWIN. DEFENDANT, IRWIN ACTIONS CONSTITUTED FREE SPEECH RIGHT PER FIRST AMENDMENT; 42 USC 1985 SEE: 151, 52, 276

263. ON OR NEAR 12.24.18; 3.22.19, SICK CALL, R. PLAYSO, PACS, RETALIATION, STATED PLAINTIFF HAD SUE HER - 172, CONTINUE COMMUNICATIONS WITH AUTHORITIES, CONSTANTLY FILING GRIEVANCES AGAINST HER, AND FELLOW MEDICAL PROFESSIONALS. DEFENDANT PLAYSO ACTION CONSTITUTED FREE SPEECH VIOLATION PER FIRST AMENDMENT 42 USC 1985 SEE: 143, 153, 52, 21, 199, 271, 142, 338-343, 27, 40, 363, 364, 376

264. ON OR NEAR 7.2.18, SICK CALL, DEFENDANT, L. DANNENLY, CNP; DEFENDANT, DARLING DELIBERATE INDIFFERENCE WAS DUE, ACCORDING TO DEFENDANT, DARLING, PLAINTIFF COMPLAINT: W.V. A

- IFF HAVING SUED SCI-SOMERSET MEDICAL PROFESSIONALS, CONSTANTLY FILING GRIEVANCES, AND COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, DARLING ACTIONS CONSTITUTE CONSPIRACY, FREE SPEECH VIOLATIONS AND RETALIATION PER FIRST AMENDMENT, 42 USC 1985 SEE: 122
245. ON OR NEAR 12.20.18; 12.24.18, SICK CALL; DEFENDANT, FETTERMAN, RETALIATION, ACCORDING TO DEFENDANT, FETTERMAN, CONTINUOUS COMMUNICATIONS WITH AUTHORITIES; HAVING SUED SCI-SOMERSET MEDICAL PROFESSIONALS, AND ALWAYS FILING GRIEVANCES, DEFENDANT, FETTERMAN ACTIONS CONSTITUTED RETALIATION-N-FREE SPEECH RIGHT PER FIRST AMENDMENT, 42 USC 1985 SEE: 140, 141, 144, 219, 240, 241-30; 39-41; 43-62; 68-71; 82; 338-343; 350-352; 354; 362-364; 366-368; 376; 200
246. ON OR NEAR 1.18.19, SICK CALL, DEFENDANT, R. HUTCHINSON, PAC.; RETALIATION ACCORDING TO DEFENDANT, HUTCHINSON, FOR PLAINTIFF CONTINUOUS COMMUNICATION WITH AUTHORITIES, FILED A GRIEVANCE AGAINST DEFENDANT, HUTCHINSON; HAVING SUED DEFENDANT, HUTCHINSON-N-SCI-SOMERSET MEDICAL PROFESSIONALS, DEFENDANT, HUTCHINSON ACTIONS CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATION PER FIRST AMENDMENT, 42 USC 1985 SEE: 145, 52, 202, 204, 145, 21, 280, 338-343; 350-352; 354; 362-364; 366-368; 376; 21-30; 39-41; 43-62; 68-71; 82.
247. ON OR NEAR 3.22.19; 4.12.19; 6.17.19; SICK CALL; DEFENDANT, D. TESTA, PAC; RETALIATIONS BASED ON PLAINTIFF HAVING SUED SCI-SOMERSET MEDICAL PROFESSIONALS, CONSTANTLY FILING GRIEVANCE, AND CONTINUOUS COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, TESTA ACTIONS CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATION PER FIRST AMENDMENT, 42 USC 1985 SEE: 153, 158, 52, 166, 206, 281, 338-343; 350-352; 354; 362-364; 366-368; 376; 21-30; 39-41; 43-62; 68-71; 82
248. ON OR NEAR 11.7.18; 12.19.18; 7.19.19; CONFIDENTIAL INTERVIEW, DEFENDANT, E. TICE, WARDEN; FAILURE TO ACT, BASED ON PLAINTIFF HAVING SUED SCI-SOMERSET-N-SCI-GREENE DOC STAFF, AND MEDICAL PROFESSIONALS, PLAINTIFF COMPLAINTING ABOUT DEFENDANT, TICE THROUGH CONTINUOUS COMMUNICATIONS WITH AUTHORITIES, ALWAYS FILING GRIEVANCES-N-LAWS, DEFENDANT, TICE NON ACTION-N-ACTION CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATIONS PER FIRST AMENDMENT, 42 USC 1985 SEE: 52, 127, 207, 21, 29, 126, 137, 138, 206, 209, 220-222, 282, 338-343; 350-352; 363; 364; 367; 376; 22-31; 140; 43-68; 70; 71; 31
249. ON OR NEAR 12.24.18; 1.17.19; 5.6.19-5.8.19; ACCESS TO MEDICAL CARE; DEFENDANT, B.P. HYDE, BASED, ACCORDING TO DEFENDANT, HYDE, HEALTH CARE ADMINISTRATOR, PLAINTIFF HAD SUED HIM-N-SCI-SOMERSET MEDICAL PROFESSIONALS, CONTINUOUSLY FILING GRIEVANCES, AND COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, HYDE ACTS CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATIONS PER FIRST AMENDMENT, 42 USC 1985 SEE: 52, 141, 159-160; 142; 166; 36, 99; 147; 159-162; 169; 283; 338-343; 346; 350-354; 363; 364; 367; 375; 376; 31
270. ON OR NEAR 4.2.19; 5.30.19; 9.5.19, SICK CALL, DEFENDANT, K. DELISMA, MEDICAL, RATIONALE, TO PENALIZE PLAINTIFF FOR FILING A GRIEVANCE AGAINST DEFENDANT, SUING MEDICAL PROFESSIONALS UNDER DEFENDANT, DELISMA SUPERVISION, CONSTANTLY FILING GRIEVANCES-N-COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, DELISMA ACTION CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATION PER FIRST AMENDMENT, 42 USC 1985 SEE: 21, 87, 138; 151; 156; 22-60; 61; 259; 338-342; 350-354; 363; 364; 367; 368; 376
271. ON OR NEAR 9.10.19, ACCESS TO RELIGIOUS LITERATURE, DEFENDANT, UNIT MANAGER, W.L. BOWERS ACTION WAS BASED ON THE RATIONALE, PLAINTIFF HAD SUED HIM, ALWAYS FILED GRIEVANCES, AND COMMUNICATIONS WITH AUTHORITIES. DEFENDANT, W. COMPLAINT: W.V.D

L, BOWERS ACTIONS CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATIONS PER FIRST AMENDMENT; 42 USC 1985; SEE 52, 214, 216, 217, 219, 222, 223, 225, 232, 236, 237, 240, 243, 250, 251, 338-342, 349, 351, 355, 356, 363-365, 369, 374, 375, 376
 272. ON OR NEAR 4.8.17; FAILURE TO ACT; DEFENDANT, R. SNYDER, SECURITY CAPT. RATIONALE THAT PLAINTIFF HAD SUED SEC-BRENE DOC STAFF-N-MEDICAL PROFESSIONALS, CONTINUALLY FILING GRIEVANCES AND COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, SNYDER ACTIONS CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATIONS PER FIRST AMENDMENT; 42 USC 1985; SEE 52, 252-254, 185, 186, 332, 236, 338-342, 349, 351, 355, 356, 363, 364, 369, 374, 376
 273. BEGINNING ON OR NEAR 4.11.8 - STILL ONGOING, SPATS OFFCETATING, DEFENDANT, R. PESCHOCK, ACTIVITIES SPECIALIST, TO DATE! CONTINUE ABUSE PLAINTIFF FOR HAVING SUED HER, FILLED A GRIEVANCE AGAINST DEFENDANT, PESCHOCK, AND COMMUNICATING WITH AUTHORITIES, DEFENDANT, PESCHOCK ACTIONS CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATION PER FIRST AMENDMENT; 42 USC 1985 SEE 52, 187, 191, 338-342, 351, 358-364
 274. ON OR NEAR 1.15.18; SICK CALL, DEFENDANT, J. BIRONE, DOCTOR; RATIONALE FOR HIS MISCONDUCT, PLAINTIFF SUED DEFENDANT, BIRONE CO-WORKERS, CONSTANTLY FILED GRIEVANCES; AND COMMUNICATED WITH AUTHORITIES, DEFENDANT, BIRONE ACTIONS CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATIONS; 1st AMENDMENT; 42 USC 1985; SEE 52, 114, 115, 260
 275. ON OR NEAR 4.3.18, 3.13.18, 12.4.18, 2.4.19; SICK CALL, DEFENDANT, E. KAUFFMAN, PACS, EACH OCCASION, DEFENDANT, KAUFFMAN PROFESSED A DENIAL OF MEDICAL CARE BECAUSE PLAINTIFF SUED HIM, SUED HIS COWORKERS, ALWAYS FILED GRIEVANCES-N-COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, KAUFFMAN ACTIONS CONSTITUTED RETALIATION-N-FREE SPEECH VIOLATIONS PER FIRST AMENDMENT; 42 USC 1985 SEE 52, 118-120, 196, 132, 26/338-342, 350-352, 354, 363, 364-369, 375, 376, 21-30, 35-37, 39-41, 43-46, 338-342, 352, 353, 354, 363-369, 375-376
 276. ON OR NEAR 12.18.17; EYE EXAMINATION; DEFENDANT, R. IRWIN, OPTOMETRIST, DELIBERATE INDIFFERENCE TO PLAINTIFF WEARING DARK SUNGLASSES, RIGHT EYE DISCHARGING PUS-N-BLOOD, DEFENDANT, IRWIN RESPONDED TO PLAINTIFF REPEATED REQUEST TO BE SEEN BY OPHTHALMOLOGIST, DEFENDANT, IRWIN APPEARED ANGRY WITH PLAINTIFF, DECLARED TO PLAINTIFF "YOU SUR HAVE AN ~~AWFUL~~ AWFUL TO TELL AUTHORITIES, KEEP MY NAME OUT OF YOUR GRIEVANCES ~~DEFENDANT~~, ON OR NEAR 9.27.17; 10.18.17; 2.19.19; ALL THREE OCCASIONS, EYE EXAMINED; DEFENDANT, R. IRWIN DENIED PLAINTIFF, ACCORDING TO DEFENDANT, IRWIN, TO PENALIZE PLAINTIFF FOR SUING HIM, FILING GRIEVANCE AGAINST DEFENDANT, IRWIN, PLAINTIFF HAD SUED DEFENDANT, IRWIN CO-WORKER, ALWAYS FILED GRIEVANCE-N-COMMUNICATED WITH AUTHORITIES, DEFENDANT, IRWIN CONSTITUTED CRUEL-N-UNUSUAL PUNISHMENT, RETALIATION-N-FREE SPEECH VIOLATIONS UNDER 1st, 8th AND 14th AMENDMENT; 42 USC 1985 SEE 52, 196, 197, 151, 262, 338-342, 350-352, 354, 364-369, 363, 375, 376, 40, 21, 54
 277. ON OR NEAR 12.24.18; 3.22.19, SICK CALL, DEFENDANT, R. PLAYSO, PAC; ENCOURAGED CO-WORKERS-N-ACTED IN CONCERT TO DENY PLAINTIFF MEDICAL CARE TO PENALIZE PLAINTIFF FOR SUING DEFENDANT, PLAYSO, FILING GRIEVANCES AGAINST DEFENDANT, PLAYSO; SUING SEC-SOMERSOME MEDICAL PROFESSIONALS, ALWAYS FILING GRIEVANCES-N-COMMUNICATIONS WITH AUTHORITIES, DEFENDANT, PLAYSO ACTIONS CONSTITUTED RETALIATION, CONSPIRACY-N-FREE SPEECH VIOLATIONS PER 1st AMENDMENT; 42 USC 1985; SEE 52, 198, 199, 141, 153, 143, 263, 54, 40, 338-342, 350-352, 354, 21, COMPLAINT: W.V.D. 34 363-369, 375, 376

1995 SER: 52, 122, 204, 21, 27, 42-51, 56-60, 200, 39, 40, 22-26, 40, 334-341, 350, 351, 352, 363-369, 375, 376, 341

880. NOR NEAR 1.18.19; SICK CALL; DEFENDANT, R. HUTCHINSON, DOCTOR, PENALIZED PLAINTIFF FOR HAVING SUED DEFENDANT, HUTCHINSON-N-CO WORKERS, THE SCI-SOMMER-SET MEDICAL PROFESSIONALS, ALWAYS COMMUNICATING WITH AUTHORITIES-N-FILING GRIEVANCES. DEFENDANT, HUTCHINSON ACTIONS CONSTITUTED RETALIATION PER 1ST. AMENDMENT; 42 USC 1983 SER: 52, 145, 266; 21, 40, 27, 338-342, 350-352, 363-369, 375, 376, 54

822, ON OR NEAR 11-7-18, 12, 19, 18, 7, 19, 19; INTERVIEWS; DEFENDANT, E. TICE; WARDEN; ACTED IN CONCERT TO PENALIZE PLAINTIFF FOR SUING SOL-GREENE-N-SOL-SOMERSET DOC STAFF, AND MEDICAL PROFESSIONALS, FILING GRIEVANCES, AND COMMUNICATIONS WITH AUTHORITIES. WHEREIN DEFENDANT, TICE PARTICIPATED IN THE MISCONDUCT, OR DID NOT CORRECT OR STOP THE MISCONDUCT OF THOSE UNDER HIS SUPERVISION. DEFENDANT, TICE ACTION-N-NON ACTIONS CONSTITUTED CONSPIRACY, RETALIATION-N-FREE SPEECH VIOLATIONS UNDER FIRST AMENDMENT. 42 USC. 1985; SEE: 52, 127, 209, 268, 21, 27, 40, 54, 220-224, 232, 236, 249, 268, 338-342, 350-362, 363-369, 375, 376, 31

284. PLAINTIFF HAS NO PLAIN, ADEQUATE OR COMPLETE REMEDY AT LAW TO REDRESS THE WRONG DESCRIBED HEREIN HAS BEEN AND WILL CONTINUE TO BE IRREPARABLY INJURED BY THE CONDUCT OF DEFENDANTS UNLESS THIS COURT GRANT THE DECLARATORY AND INJUNCTIVE RELIEF WHICH PLAINTIFF SEEKS.

35

VII INJURY

285. PLAINTIFF ALLEGED AND INCORPORATE BY REFERENCE PARAGRAPHS 1-284
286. IRREPARABLE INJURY OF LOSS OF REWARDS IN THE AFTERLIFE DUE TO DENIAL OF "DAILY" PRAISE-N-WORSHIP; AND PROSELYTIZING, STILL ONGOING TO DATE!
287. HEART FAILURE
288. BOTH FEET COVERED IN CALLUS SKIN CAUSING WALK TO BE PAINFUL
289. THE MANDATES OF WASHINGTON V. KLEM SETTLEMENT, SCI-SOMERSET ALREADY APPROVED OF EXCESS RELIGIOUS-N-LEGAL PROPERTY, WHICH TO DATE! HAS CAUSED PLAINTIFF "DAILY" PRACTICE OF PLAINTIFF RELIGIOUS BELIEFS TO BE IMPOSSIBLE
290. AFFECTS OF DIGESTIVE DISORDER, i.e. PERICARDITIS, VISION PROBLEMS, LOSS OF MUSICAL PHYSIQUE, MEMORY LOSS, LOSS OF STAMINA, ENERGY, CONCENTRATION, CIRCULATION PROBLEM, SUDDEN-N-BROSS LOSS OF WEIGHT
291. FURTHER LOSS OF EYESIGHT IN RIGHT EYE
292. PSYCHOLOGICAL DAMAGES AS RESULT OF INABILITY TO PRACTICE RELIGIOUS BELIEFS
293. EARLY STAGE OF DEMENTIA
294. LOSS OF ABILITY TO EAT-N-DIGEST VARIOUS FOODS
295. INABILITY TO RAISE VOICE ABOVE A WHISPER
296. IREVERSIBLE FOOT FUNGUS, WHICH ENTAILS BLACKENED TOE NAILS, FEET COVERED IN SKIN SO DRY IT'S LIKED UNTO ALLIGATOR HIDE, AND LARGE CALLUSES
297. DETERIORATION OF MUSCLES
298. DEFORMED ANKLES, ELBOWS, FINGERS
299. LOSS OF EXPENSIVE RELIGIOUS BOOKS
300. URETHRAL STRICTURE
301. DUE TO DENIAL OF MEDICAL CARE AT ALL TIMES RELEVANT THE FOR EATING INEVITABLE WILL GET WORST

VIII. PRAYER FOR RELIEF

302. PLAINTIFF ALLEGED AND INCORPORATE BY REFERENCE PARAGRAPHS 1-301
303. IMMEDIATE PLACEMENT IN JOHNS HOPKINS OR WALTER REED HOSPITAL AND REMAIN THERE UNDER THE CARE-N-PROVIDED CARE BY SPECIALISTS UNTIL PLAINTIFF IS PERSONALLY CONVINCED ALL OF PLAINTIFF HEALTH PROBLEMS ARE CURED OR CORRECTED.
304. IMMEDIATE NEEDED SURGERY ON EYE OR EYES AT WILLS EYE CLINIC IN PHILADELPHIA.
305. IMMEDIATE MEDICAL CARE BY OPHTHALMOLOGISTS, GASTROENTEROLOGISTS, OTOLARYNGOLOGIST, UROLOGIST, CARDIOLOGISTS, DERMATOLOGISTS, PODIATRISTS AND ALL OTHER SPECIALISTS, CONDUCTED AT JOHNS HOPKINS UNIVERSITY HOSPITAL, OR WALTER REED HOSPITAL.
306. ALL MEDICAL CARE FREE OF CHARGE, i.e. SICK CALL, DOCTOR'S VISITS, MEDICINES FOR LIFE, INCLUDING HOSPITAL STAYS-N-SPECIALISTS
307. PLAINTIFF'S PERSONAL CHOICE OF A SUPPLEMENTAL DIETS, PERMANENTLY FOR LIFE
308. FOLLOW UP MEDICAL CARE BY SPECIALISTS CONDUCTED ON A WEEKLY BASIS
309. PROVIDE PLAINTIFF WITH A DOCTOR'S VISIT THREE DAYS PER WEEK FOR LIFE WITH COMPLAINTS W.V.D.

- OUT HAVING TO SUBMIT A SICK CALL REQUEST
310. MEDICAL DEPARTMENT RESPOND THE NEXT DAY WITH CARE THAT MEETS THE REQUIREMENTS OF THE EIGHTH AMENDMENT TO EACH-N-EVERY SICK CALL REQUEST
311. MEDICAL RECORDS THAT DICTATES THAT PLAINTIFFS TO BE ONLY HOUSED ON THE TOP TIER UNTIL PLAINTIFF IS CONVINCED PERSONALLY IT IS A HEALTH PROBLEM, OR PLAINTIFF REQUEST TO MOVE
312. PERMANENT Z-CODE STATUS
313. HAIR TRANSPLANT
314. NO LIMITS ON IN CELL STORAGE, AND R-N-D STORAGE SPACE
315. TO BE ENFORCED IN FACILITIES AFFILIATED WITH THE PA, DOC (INCLUDING OUT PATIENT PROGRAMS, HALFWAY HOUSES-N-MENTAL INSTITUTIONS) SHALL PROVIDE PLAINTIFF SPACE, A SPECIFIC DAY OF THE WEEK, AND TIME FOR WEEKLY WORSHIP SERVICES, AND STUDY GROUPS, AND SEAB: SELF ENHANCEMENT AWARENESS GROUP, ALL CONSISTING OF 120 MINUTES PER SESSION, ANNUAL CELEBRATIONS, AND FESTIVITIES THAT ARE RECOGNIZED BY THE CHILDREN OF THE SUN CHURCH, I.E. BLACK HISTORY MONTH, I.E. THE ENTIRE MONTH OF FEBRUARY, KWANZAA SEASON, I.E. DECEMBER 26-JANUARY 1st; AFRICAN LIBERATION-MAY 25th; JUNETEENTH; NAKUMBA KAY- NOVEMBER 11th; AND ANNUAL PICNIC; PLAINTIFF RELIGIOUS SERVICES ARE GROUNDED IN THE TEACHINGS OF THE CHILDREN OF THE SUN CHURCH. . . . THE CHILDREN OF THE SUN CHURCH GRANTED PERMANENT PERMISSION TO SPONSOR A SALE ONCE EVERY THIRTY DAYS, WHEREIN THE CHILDREN OF THE SUN CHURCH RECEIVES ONE HUNDRED PERCENT OF THE PROFITS-N-PROCEEDS, TOTAL FREEDOM TO INVITE A SPEAKER, OR GUEST SPEAKER FOR WORSHIP SERVICES-N-FESTIVITIES, PLAINTIFF WILL DECIDE.
316. PERMANENT ASSIGNMENT AS FACILITATOR FOR CHRISTIAN BLACK STUDIES GROUP, LEADER OF THE CHILDREN OF THE SUN WORSHIP SERVICES, AND THE SELF ENHANCEMENT AWARENESS GROUP; SEB; PAID JOB WITH HIGHEST POSSIBLE HOURLY RATE FOR EACH GROUP, EIGHT HOURS WORK DAY, AND SEVEN DAYS WORK WEEK
317. IMMEDIATE COMPLETE COMPLIANCE, PERMANENTLY WITH THE DICTATES OF THE WASHINGTON V. KLEM, SETTLEMENT AGREEMENT
318. A DECLARATION THAT STATES THE ACTS AND OMISSIONS DESCRIBED HEREIN VIOLATED PLAINTIFF RIGHTS UNDER PA. CONSTITUTION, ARTICLE I § 26; AND FIRST, EIGHTH AND FOURTEENTH AMENDMENTS, 42 USC 1985; 2000CC, 1-5; 18 USC 133247
319. PRELIMINARY-N-INJUNCTIVE RELIEF
320. COMPENSATORY DAMAGES IN THE AMOUNT OF \$1,000,000 AGAINST EACH DEFENDANT JOINTLY AND SEVERALLY, PER VIOLATION OF PLAINTIFF 1st, 8th, 14th, AND RU-IAN RIGHTS, AND 42 USC 1985; 18 USC 133247
321. COMPENSATORY DAMAGES FOR PSYCHOLOGICAL OR EMOTIONAL INJURY IN THE AMOUNT OF 1,000,000
322. TWENTY DOLLARS OF FREE PHOTO COPYING PER WEEK
323. A LIFE TIME SUBSCRIPTION OF PLAINTIFF CHOICE OF FOUR DIFFERENT NEWSPAPERS, MAGAZINES, NEWSLETTERS; AND A WEEKLY SUPPLY OF PLAINTIFF CHOICE OF ARTICLES
- COMPLAINT: W V. D

338. PLAINTIFF ALSO CONTACTED SEVERAL DIFFERENT ATTORNEYS e.g. ANGELINA BRYANT, VIC WALCZAK, LETICIA CHAVEZ-FREED, SUSAN LIN, A. SCOTT BOLDEN, BLAINE JONES, JEFFREY FIEBER, ROY BLACK, WILLIAM KUNSTER, RON KUBY, BRET BRATE, DUSTIN Mc DANIELS, COUNTLESS OTHERS

339. THIS CAUSED PA. DOC COMMISSIONER JOHN WHEZEL, PA. DOC CENTRAL OFFICE, PRISON STAFF, MEDICAL PROFESSIONALS, UNIT MANAGERS TO RETALIATE AGAINST PLAINTIFF IN THE MOST VICIOUS WAY; STILL ON GOING AT SCI-SOMERSET TO DATE!

340. DEFENDANTS, K. DELISMA, WILLIAM L. BOWERS, PHILLIP MAUST, HEIDI SROKA, ROBERT SNYDER, R. PESCHACK, J. GIBRONE, ELLIS KAUFFMAN, RICHARD IRWIN, ROXANNE PLAYSO, LARENE DONNEAU, FETTERMAN, RICHARD HUTCHINSON, D. TESTA, E. TICE; B. P. HYDE ON MORE THAN TWO OCCASIONS, SOME THREE-FOUR TIMES THEY WERE GOING TO PENALIZE PLAINTIFF FOR FILING GRIEVANCES AGAINST THEM PERSONALLY, OR THEIR COWORKERS, FOR SUING DOC STAFF-N-MEDICAL PROFESSIONALS AT SCI-SOMERSET-N-SCI-GREENE, THEIR FAMILY MEMBERS, FRIENDS, NEIGHBORS, ARMY BUDDIES, etc.; CONTINUOUS COMMUNICATIONS WITH AUTHORITIES; i.e. U.S. DISTRICT COURT, D.O.J., FILING GRIEVANCES-N-REQUEST TO STAFF CONCERNING AL-LEAVING PLAINTIFF TIMELY SUBMITTED GRIEVANCES NOT BEING RESPONDED TO, /AND OR CONCERNING ~~THEIR~~ THEIR CONTINUOUS RETALIATIONS AGAINST PLAINTIFF. SEE: 27, 31, 40, 56, 57, 60, 64, 138, 217, 218, 259-283

341. EACH DEFENDANT ROUTELY TAUNTED PLAINTIFF WITH THEIR BRAGGING-N-BOASTING OF HAVING PLAINTIFF PENALIZE ~~BECAUSE~~ PLAINTIFF TO EXPERIENCE HEART ATTACK SYMPTOMS, DENIAL OF MEDICAL CARE-RLUIPA-RELIGIOUS PRACTICE-EQUAL PROTECTION-N-FREE SPEECH RIGHTS, CONSPIRACY, RETALIATION, DENIAL OF ACCESS TO IN-MATE GRIEVANCES SYSTEM, DICTATES OF WASHINGTON V. KLEIM SETTLEMENT SEE: 40, 52, 57, 60, 62, 150, 223, 342

342. THESE WERE NOT JUST INDIVIDUALS BLOWING OFF STEAM, EACH SCI-SOMERSET DOC STAFF MEMBERS-N-MEDICAL PROFESSIONALS CITED IN THIS LEGAL ACTION FOLLOWED UP THEIR THREATS WITH ACTION SEVERAL TIMES OVER SEE: 1-376 PASSIM

343. PLAINTIFF EXHAUSTED ALL AVAILABLE REMEDIES PURSUANT TO DC-ADM, 804 IN-MATE GRIEVANCE SYSTEM, e.g. NUMEROUS TIMES PLAINTIFF SUBMITTED TWO-THREE TIMES, AND REQUEST TO STAFF BECAUSE THE INITIAL GRIEVANCES, TIMELY SUBMITTED WERE NOT RESPONDED TO. SEE: 56, 88-98, 100-105, 342

344. EACH-N-EVERY GRIEVANCE I SUBMITTED WHERE I REQUESTED MONETARY RELIEF THE GRIEVANCE COORDINATOR DID NOT RESPOND TO; SO MORE THAN TWO TIMES I ASKED CONFIDENTIALLY, WHY. THE GRIEVANCE COORDINATOR, H. SROKA RESPONDED AS IF SHE TOOK EXCEPTION TO MY ASKING SUCH A QUESTION, SHE FLAT OUT TOLD ME SHE WAS ^{NOT} GOING TO RESPOND TO EVERY GRIEVANCE WHERE I REQUESTED MONETARY RELIEF, AND MY REQUEST TO STAFF CONCERNING WHY SHE DIDNT RESPOND TO THOSE GRIEVANCES, ACCORDING TO MS. SROKA THE WARDENS, AND DEPUTY WARDENS GAVE HER DIRECT ORDERS NOT TO RESPOND SEE: 342, 347

COMPLAINT: W.V. D

345. THE WARDENS, DEPUTY WARDEN DURING THE TENURE OF DEFENDANT, H. SROKA TRAVAR WINGARD-N-MELISSA HAINSWORTH, ON MORE OCCASION I MADE BOTH A ^{NOT} THAT ~~ONE~~ OF MY GRIEVANCE WHERE I'D REQUESTED MONETARY RELIEF WERE ^{AND} SPONDED TO. DURING EACH INTERVIEW, CONDUCTED SEPARATELY FROM THE OTHER I WAS SCOLDEN-N-ACCUSED OF MY COMMITTING DISCORD AMONG INMATES-N-STAFF, TOLD I WAS DISOBTEDIOUS, BEING DISRESPECTFUL, DISRUPTIVE, DESTRUCTIVE; ACCORDING TO THE WARDENS: WINGARD-N-HAINSWORTH, THEY BOTH HAD GIVEN THE GRIEVANCE COORDINATOR, H. SROKA, DIRECT ORDERS NOT TO RESPOND EVERY GRIEVANCE WHERE I REQUESTED MONETARY RELIEF; AND I WOULD BE WASTING MY TIME TO CONTINUE FILING GRIEVANCES REQUESTING MONETARY RELIEF

346. ACCORDING TO THE GRIEVANCE COORDINATOR, H. SROKA, DECLARED, THERE WAS ABSOLUTELY NO FAULTS OR SHORT COMINGS IN THE GRIEVANCES I'D FILED WHICH SHE ASSIGNED A GRIEVANCE TRACKING NUMBER; OTHER ^{WISE} SHE WOULD HAVE REJECTED MY GRIEVANCE, ACCORDING TO MS. SROKA, IT WAS NOT NECESSARY FOR ME TO REQUEST MONETARY RELIEF IN A GRIEVANCE, WHY COULDN'T I GET IT

347. I BELIEVE IT WOULD BE HELPFUL FOR THE COURT TO KNOW, I AM 75 PLUS YEARS OF AGE, ^{ABLE} WEAK, OFTEN IN SUCH PAIN-N-DISCOMFORT I AM UNABLE TO STAND UPRIGHT, INCAPABLE OF SPEAKING ALOUD, I DO NOT HAVE A ARMY, I AM A POOR BLACK MALE, NO FAMILY MEMBERS IN THE STATE OF PENNSYLVANIA, BOTH PARENTS NOW DECEASED, THEREFORE, I AM UNABLE TO HIRE AN ATTORNEY; AND NOBODY OF INFLUENCE TO SPEAK ON MY BEHALF, SO I CAN NOT! FORCE THE GRIEVANCE OFFICER TO RESPOND TO MY GRIEVANCES, I APPEALED TO BOTH WARDENS WHOM TOLD ME THAT I WAS WRONG FOR REQUESTING MONETARY RELIEF; AND THE GRIEVANCE COORDINATOR NOT RESPONDING TO MY GRIEVANCE WAS THE PROPER ACTION TO TAKE AND GROUNDED IN DOC POLICY DC-ADM 804; PLUS BOTH OPENLY STATED THEY'D PERSONALLY TOLD MS. SROKA NOT! TO RESPOND, I'VE DONE ALL I CAN DO, IF BOTH WARDENS, AND THE GRIEVANCE COORDINATOR HER SELF ALL ACTED IN CONCERT AGAINST ME

348. I AM NOT A HEALTHY PERSON, HAVING GONE THROUGH SIX STRAIGHT YEARS OF SHEER TORTURE, I.E. FINGERS, CARROTS, CUCUMBERS, BATON TIPS FOKED INTO MY RECTUM, DISINFECTANT-TO-BACCO-N-SNUFF SPIT-ATCH UP SQUIRTED IN TO MY RECTUM, PUNCHED, JABBED WITH STICKS, KICKED, DENIED FOOD, MEDICAL CARE, SPAT UPON, ETC. I AM VIVIDLY AFRAID FOR LIFE, EACH TIME I FILE A GRIEVANCE I AM ATTACKED; I SUFFER; I AM 75 PLUS YEARS OF AGE, NOBODY ACTS ON MY BEHALF; SO IF ~~THE~~ WARDENS (E.TICE, M. HAINSWORTH, T. WINGARD) WON'T HELP ME, THEN A GRIEVANCE COORDINATOR CAN SUMMARILY DISCARD MY GRIEVANCES, AND I'M TOLD SHE NOT GOING TO RESPOND; I AM HELPLESS. I TRULY CANNOT FORCE THE GRIEVANCE COORDINATOR TO RESPOND TO MY GRIEVANCE, SEE: 336, 342

349. PLAINTIFF IS THE FOUNDER-N-LEADER OF THE CHILDREN OF THE SUN CHURCH, WHO EARN REWARDS IN THE AFTERLIFE BASED ON THE NUMBER OF EYES I/FOLLOWERS OPEN WITH THE TEACHINGS OF THE CHURCH CONCERNING AFRIKAN GOD, HIS NAME, AFRIKAN PEOPLE-KINGDOMS-EMPIRES-HEROINES-HEROES, ETC. THE RELIGIOUS BOOK-N-LITERATURE, AND THE RELIGION ARE ONE-N-THE SAME, SO E.TICE, W.L. BOWERS-N-P. MAUST DENY ME MY COMPLAINT: WLV: D

350. TO DATE! MY HEALTH IS RAPIDLY FAILING, I SUBMIT 2-3 SICK CALL REQUEST ON WEEKLY BASIS, RARELY ARE THE SICK CALL REQUEST RECOGNIZED AND WHEN THEY ARE I AM MOCKED, WHAT FOLLOWS IS MEDICAL PROFESSIONALS AT SCI-SOMERSET TO DATE! ARE DENYING ME MEDICAL CARE THAT IS REQUIRED BY THE EIGHTH AMENDMENT; STILL NEAR BLIND IN RIGHT EYE, SO WEAK WALKING IS TIERESOME, UNABLE TO SPEAK ALOUD, URETHRAL STRICTURE, CONTINUING DIGESTIVE PAIN, UNABLE TO EAT APPROXIMATELY EIGHTY PERCENT OF THE FOODS SERVED TO INMATES WITHOUT EXPERIENCING NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT THROUGHOUT MY DIGESTIVE TRACT, etc. WITHOUT THE HELP OF THE COURT I WILL PROBABLY DIE BROKE, BLIND, HUNGRY, FULL BLOWN DEMENTIA, BLAMED FOR MY OWN DEATH.
SEE: 21; 23-26; 28; 29; 33-34; 39; 41; 59; 61; 62; 66; 80-87; 113-120; 122; 123; 128-136; 139-170; 192-211; 341; 376

351. I AM A DARK SKIN BLACK MALE WHO DEFENDANTS CONSISTANTLY SINGLE OUT FOR MOCKERY, DENY MEDICAL CARE, RELIGIOUS PRACTICE, AND BASIC HUMAN NEEDS, SPORTS OPPORTUNITIES.
SEE: 21; 26; 52; 65; 70; 112; 114; 115; 117; 120; 122; 123; 128; 132-135; 145; 148; 150; 157-159; 166; 167; 341; 376

352. WITHOUT BEING IN PLAINTIFF PRESENCE FOR WEEKS IGNORING 2-3 SICK CALL REQUEST PER WEEK, AND NUMEROUS REQUEST TO STAFF ADDRESSED TO DEFENDANT, K. DELISMA, THE MEDICAL DIRECTOR, HAVING NEVER! TOUCHED PLAINTIFF PHYSICALLY TO CONDUCT A CURSORY EXAM OF BLOOD PRESSURE, HEART RATE, BREATHING PATTERN-N-PUPIL DILATION; NO LAB TESTING OF BLOOD; URINE OR STOOL SAMPLE, OR PAP SMEAR, YET, DEFENDANT, DELISMA ORDERED HIS SUBORDINATES, i.e. NURSE PRACTITIONERS-N-PHYSICIANS ASSISTANTS, J. GIRONE, E. KAFFMAN, R. IRWIN, R. PLAYSO, L. DARLING, FEETERMAN, R. HUTCHINSON, D. TESTA; NOT TO PROVIDE ME MEDICAL CARE FOR THOSE HEALTH PROBLEMS. N.B. DEFENDANT, DELISMA HABITUALLY AVOID PHYSICAL CONTACT WITH ME FOR WEEKS, OR COMMUNICATIONS WITH ME BY MAIL OR PHONE, NOR HAD DEFENDANT, DELISMA EVER PROVIDED ME AN EXAMINATION, YET THE MEDICAL PROFESSIONALS, FORENAME TURNED ME AWAY WHILE I WAS IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT.
SEE: 21; 25; 114; 118; 120; 122; 131; 133; 140; 143; 144; 146; 150; 154; 157; 160; 342; 376

353. SEVERAL TIMES OVER DEFENDANT, B.P. HYDE HAS BEEN MADE AWARE, AND MORE THAN TWO OCCASIONS HYDE WAS PERSONALLY CONFERRED WITH, THEN STOOD AT THE STAFF OF MEDICAL PROFESSIONALS TALKED TO ME IN A RACIST-N-BIGOTED MANNER, REFUSED TO PROVIDE ME MEDICAL CARE FOR MY SERIOUS HEALTH PROBLEMS, SENDING ME AWAY IN NON STOP EXCRUCIATING PAIN-N-EXTREME DISCOMFORT, DEFENDANT, HYDE DID NOT ATTEMPT TO STOP OR CORRECT THE RACIST-BIGOTED, AND ILLEGAL ACTIONS OF DEFENDANTS; i.e. MEDICAL PROFESSIONALS, BUT DEFENDANT, HYDE, ENCOURAGED IT, SAYING "FUCK HIM"
I WAS MOVED TO DEEP FEAR, CAUSING ME TO URINATE ON MYSELF, I AM VIVIDLY AFRAID FOR MY LIFE AND EVEN MORE SO TO BE NEAR DEFENDANTS, & MEDICAL PROFESSIONALS -N- B.P. HYDE.
SEE: 143; 149; 159-162; 249; 283; 342; 376; 21

354. WHITE INMATES ARE PROVELED UPON REQUEST, BASED UPON NON MEDICAL REASONS, I.E. RACE, RELIGION, NOT SIGNING OFF ON GRN⁶⁵⁹²³⁶, COMMUNICATION WITH AUTHORITIES I AM BEING CONTINUOUSLY DENIED A DIET SUPPLEMENT CONSISTING OF READILY AVAILABLE FOODS AT A MINIMAL COST, AND ZERO MAN HOURS, DEFENDANTS, K. DELEMA, J. BIRONE, E. KAUFFMAN, R. IRWIN, R. PLAYS, L. DONNELLY, R. HUTCHINSON, FETTERMAN, D. TESTA, B. P. HYDE DENIED-N-CONTINUOUSLY DENY MR. CARE BY SPECIALIST-N-MEDICINES ALREADY ORDERED BY DOCTORS AND RECOMMENDED BY SPECIALIST
SFE: 21; 25; 26; 30; 64; 67; 70; 71; 73; 336; 342; 366; 376

355. I AM CONTINUOUSLY HAUNTED BY SATAN, AND NABED BY EVIL SPIRITS DUE TO THE FACT I HAVE BEEN RENDERED UNABLE TO PRACTICE MY RELIGIOUS BELIEFS, DUE DEFENDANTS, P. MAUST, W. L. BOWERS, AND R. SNYDER DENAL OF RELIGIOUS LITERATURE C, F, THE DAILY PRACTICE OF MY RELIGIOUS BELIEFS PROVIDED ME WITH A BARRIER WHERE THE SPIRIT OF THE DEVIL-N- SATAN AVOIDED ME. SFE: 30; 41; 54; 59; 214; 217; 21-47; 48; 54; 181-186; 215-217; 215-258; 271; 272; 273; 349; 351; 356

356. I HAVE DEMENTIA, WHICH IS IN ITS EARLY STAGE, MY RELIGIOUS PRACTICE AND THE LOCATION OF THE CELL I AM ASSIGNED TO ARE TWO CRUCIAL COMPONENTS THAT PROVIDES ME ^{SOME} MEASURES OF STABILITY, TO DATE! I AM BEING DENIED MY RELIGIOUS PRACTICE, AND "FORCED" TO HOUSE IN A LOCATION THAT DEPRIVES ME OF ALL SERENITY WHICH IS CAUSING ME A CONTINUOUS MENTAL STRUGGLE; WITH NUMEROUS COMPATIBLE CELLS AVAILABLE, DURING 10.6.17 - FEBRUARY 2019 SPAND, WHITE INMATES ARE NOT ASSIGNED TO THE CELL I WAS FORCED! TO HOUSE FOR 420 PLUS STRAIGHT DAYS, DUE TO THE LOCATION OF THE CELL. IN THE PAST I WAS MOVED OUT OF THE "EXACT SAME CELL" DUE TO THE PSYCHOLOGICAL AFFECT I EXPERIENCED. DEFENDANT, WIL. BOWERS WAS AWARE OF ALL OF THE FOREMENTIONED INFORMATION PRIOR TO ASSIGNING ME TO THE CELL; STILL DEFENDANT, BOWERS DISREGARDED THE RISK TO MY MENTAL HEALTH, STILL ASSIGNED ME TO THAT CELL. DEFENDANT, BOWERS DISREGARDED THE FOREMENTIONED INFORMATION PROVIDED TO HIM BY MORE THAN THREE PSYCHOLOGISTS; AND TWO PSYCHIATRISTS, WITHOM SUCINCTLY TOLD DEFENDANT, BOWERS THAT I AM BEING PERMANENTLY DAMAGED PSYCHOLOGICALLY DUT TO WHERE I WAS BE HOUSED FORCEFULLY. DEFENDANT, BOWERS RESPONSE, "WASHINGTON'S ANCESTORS LIVED IN HUTS, SO WHAT IS THE BIG DEAL, WHITE INMATES ARE READILY PLACED IN THE NUMEROUS AVAILABLE COMPATIBLE CELL UPON REQUEST WHILE I ^{WAS} DURING THE 10.16.17 - FEBRUARY 2019 SPAND BEING DENIED BASED ON NON PENOLOGICAL INTEREST, I.E. RACE, RELIGIOUS BELIEFS, NOT SIGNING OFF ON GRN⁶⁵⁹²³⁶, COMMUNICATION WITH THE AUTHORITIES
SFE: 21; 106-112; 121; 174; 175; 177-179; 342; 363-368; 375; 376

357. WHEN I SPOKE TO GRIEVANCE OFFICER, H. SROKA, I ALSO SHOWED HER MY FEET WHICH EXHIBITED MY TOE NAILS ALL BLACKENED, DISCHARGING PUS-N-BLOOD, DEFENDANT SROKA RESPONSE WAS "MY GOD! YOU NEED TO RE SEEN BY A DOCTOR", "YOU NEED A DOCTOR'S CARE", IT IS YOUR OWN FAULT, "STOP YOUR SUING-N-FILING GRIEVANCES REQUEST-MONETARY RELIEF", AND "THEN YOU GET THE MEDICAL CARE YOU NEED. SFE: 104; 245; 21; 342
COM PL AINT: W. V. D. (42)

358. TO DATE! DEFENDANT, R. PESCHOCK, INTENTIONALLY TREATS ME AS A CLASS OF ONE FOR NO RATIONAL REASON, BASED ON NON PENOLOGICAL REASONS, MY FILING A GRIEVANCE AGAINST HER, DEFENDANT, PESCHOCK, e.g. REMOVING ME FROM MY OFFICIATING JOB ROLE SOLELY BECAUSE HER PET/FAVORITE OFFICIAL DID NOT WANT TO BE PLACED IN AN ASSIGNMENT THAT REQUIRED MORE PHYSICAL MOVEMENT, THEN ASSIGN ME TO THE ASSIGNMENT HE DIDN'T WANT. N.B. THE ASSIGNMENT I WAS REMOVED AWAY FROM I PERFORMED VERY EFFICIENTLY, AND THE ASSIGNMENT HER FAVORITE CHOSE TO AVOID CAN PERFORM SUFFICIENTLY. ^{SP# 21; 187-191; 273; 27; 40; 337-342; 172; 173; 375; 376}

359. TO DATE! DEFENDANT, R. PESCHOCK REGULARLY INSULT ME, e.g. TO PENALIZE ME FOR MY SUING HER, FILING GRIEVANCE AGAINST HER, DEFENDANT, PESCHOCK PERMOTES FIRST-SECOND YEAR; OR NOVICE TO RULES I HAVE ADEQUATELY PERFORMED FOR MORE THAN FOUR ~~DEC~~ DECADES; GIVING SUCH INDIVIDUALS TWICE THE WORK HOURS-N-PAY I AM ALLOWED ALTHOUGH I AM FULLY CAPABLE OF PERFORMING JOB ROLE THESE LESS KNOWLEDGEABLE-N-SKILLED OFFICIALS ARE CURRENTLY BEING ASSIGNED. DEFENDANT, PESCHOCK ACT OF RETALIATION IS TREATING ME AS A CLASS OF ONE; AND ARE RELATED,

360. TO DATE! DEFENDANT, PESCHOCK ACTS TO PUNISH PLAINTIFF FOR HAVING SUED HER-N-FILING A GRIEVANCE AGAINST HER. THE FACT THAT EVERY WRITTEN TEST OR ORAL, AND LIVE TEST ~~GIVEN~~ TO DATE! IN THE SPORTS OF BASKETBALL, SOFTBALL, VOLLEYBALL, AND FLAG FOOTBALL I HAVE SCORED THE HIGHEST-OR AMONG THE HIGHEST; AND IT IS A RARITY THAT GIVE AN INCORRECT RESPONSE.

N.B. SOLELY TO PENALIZE ME DEFENDANT, R. ~~PESCHOCK~~ PESCHOCK IGNORE-N-DISREGARD THE OBVIOUS MISTAKE OF OTHERS, THEN PASS JUDGMENT IN HARSH DEGREE AGAINST ME FOR THE EXACT SAME MISTAKE, WHICH I SELDOM MAKE; EVEN DECLARING ME TO BE JUST ANOTHER OFFICIAL, WHILE DECLARING MORE THAN ONE OFFICIAL TO BE HER MAIN FOUR OFFICIAL, WHOM SKILLS, KNOWLEDGE OF THE GAME-N-EXPERIENCE. DEFENDANT, PESCHOCK ACTIONS WITTINGLY-N-UNWITTINGLY FOSTER-N-SUPPORT, AS WELL AS ADVANCES A CLICK-RELIGIOUS AFFILIATION-GEORGAPHIC AFFILIATION

361. PRIOR TO MY BEING IMPRISONED MY PARTTIME JOB WAS OFFICIATING SOFTBALL AND BASKETBALL, WITHIN THE PRISON SYSTEM I OFFICIATED BASKETBALL, SOFTBALL-FOOTBALL-N-VOLLEYBALL; TO DATE! 41 YEARS INSIDE OF THE PRISON SYSTEM, I AM NOT ORIGINALLY FROM THE STATE OF PENNSYLVANIA, NOT ORIGINALLY FROM PHILADELPHIA, NOT ^{IN A} HOMOSEXUAL RELATIONSHIP, NOT A MUSLIM, NOT AFFILIATED WITH A PRISON GANG, AND I AM NOT A PART OF A CLICK, ALL OF THE OTHER OFFICIALS CONSIST OF INMATES FROM PENNSYLVANIA THE MAJORITY ARE NATIVES TO PHILADELPHIA, COMMONLY FROM THE SAME AREA OF PHILADELPHIA, 95% OF THE OFFICIALS ARE INVOLVED IN HOMOSEXUAL RELATIONSHIP; MOST ARE MUSLIM, WITH THE EXCEPTION OF MYSELF, ALL ARE A PART OF CLICK, THIS MAKES ME THE ODD MAN OUT. . . . THE SOFTBALL, BASKETBALL, FOOTBALL-AND VOLLEYBALL OFFICIATING GROUPS ARE SELECTED-N-ASSIGNED TO MOST DESIRABLE ROLES, AND AFFORDED MORE

COMPLAINT: W.V. D